

# De Wave Group

## CSRD Report 2024

### Sustainability Reporting



## Summary

<b>GENERAL INFORMATION .....</b>	<b>6</b>
<b>GENERAL INFORMATION .....</b>	<b>6</b>
General criteria for preparing the sustainability statement (BP-1) .....	6
Circumstantial Disclosures (BP-2) .....	7
Role of administrative, management and control bodies (GOV-1) .....	7
Information provided to administrative, management and supervisory bodies on sustainability matters (GOV-2).....	10
Integration of sustainability performance into incentive systems (GOV-3, 4).....	11
Risk Management and Internal Controls on Sustainability Reporting (GOV-5) .....	11
Strategy, Business Model and Value Chain (SBM-1).....	12
Interests and Views of Stakeholders (SBM-2).....	14
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3) .....	15
Identification of relevant impacts, risks and opportunities (IRO-1).....	15
Disclosure requirements of ESRS (IRO-2).....	16
<b>MINIMUM DISCLOSURE REQUIREMENT ON POLICIES AND ACTIONS .....</b>	<b>17</b>
Policies adopted to manage material sustainability issues (MDR-P).....	17
Actions and resources related to relevant sustainability issues (MDR-A).....	18
<b>ENVIRONMENTAL INFORMATION .....</b>	<b>20</b>
<b>CLIMATE CHANGE .....</b>	<b>20</b>
Integration of sustainability performance into incentive systems (E1-GOV 3) .....	20
Climate Change Mitigation Transition Plan (E1-1) .....	20
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (E1-SBM 3) .....	21
Description of processes for identifying and assessing relevant climate-related impacts, risks and opportunities (E1-IRO 1).....	21
Climate Change Mitigation and Adaptation Policies (E1-2) .....	21
Climate change policy actions and resources (E1-3, 4) .....	22
Energy consumption and energy mix (E1-5).....	22
Greenhouse gas emissions (E1-6) .....	23
<b>POLLUTION .....</b>	<b>27</b>
Assessment of impacts, risks and opportunities related to pollution (E2-IRO 1).....	27
Pollution policies (E2-1).....	27

Pollution-related actions and resources (E2-2) .....	28
Pollution-related targets (E2-3).....	28
Air, water and soil pollution (E2-4).....	28
Substances of concern and substances of very high concern (E2-5).....	29
<b>WATERS AND MARINE RESOURCES .....</b>	<b>29</b>
Assessment of impacts, risks and opportunities related to water consumption and marine resources (E3-IRO-1) .....	29
Policies, targets and actions related to water consumption (E3-1, 2, 3) .....	29
Water Consumption (E3-4) .....	30
<b>RESOURCE USE AND CIRCULAR ECONOMY .....</b>	<b>31</b>
Assessment of impacts, risks and opportunities related to the use of resources and the circular economy (E5-IRO1) .....	31
Policies and actions related to resource use and the circular economy (E5-1, 2).....	31
Objectives related to the use of resources and the circular economy (E5-3).....	32
Inbound Resource Flows (E5-4) .....	32
Outbound resource flows (E5-5) .....	33
<b>SOCIAL INFORMATION.....</b>	<b>37</b>
<b>OWN WORKFORCE .....</b>	<b>37</b>
Stakeholder interests and views (S1-SBM2).....	37
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S1-SBM3).....	37
Own Labour Policies (S1-1).....	39
Involvement of workers and their representatives (S1-2) .....	41
Processes for remedying negative impacts and communication channels with own workers (S1-3) .....	42
Interventions on impacts, approaches for risk management and the pursuit of relevant opportunities in relation to the own workforce (S1-4) .....	42
Objectives related to the management of negative impacts, the enhancement of positive impacts and the management of risks and opportunities (S1-5) .....	43
Characteristics of the company's employees (S1-6) .....	43
Characteristics of self-employed persons in the own workforce (S1-7) .....	44
Diversity metrics (S1-9) .....	45
Adjusted wages (S1-10) .....	45
Social protection (S1-11) .....	45
People with disabilities (S1-12).....	46

Training and Skills Development Metrics (S1-13) .....	46
Health and Safety Metrics (S1-14).....	48
Work-life balance metrics (S1-15).....	48
Compensation metrics (S1-16) .....	49
<b>WORKERS IN THE VALUE CHAIN .....</b>	<b>50</b>
Interests and views of stakeholders (S2-SBM2) .....	50
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S2 SBM3) .....	50
Policies related to workers in the value chain (S2-1) .....	52
Processes of worker involvement in the value chain (S2-2).....	52
Remediation processes for negative impacts and communication channels (S2-3).....	52
Interventions on significant impacts and risk management for workers in the value chain (S2-4) .....	53
Objectives for the management of impacts, risks and opportunities (S2-5).....	53
<b>AFFCTED COMMUNITIES.....</b>	<b>54</b>
Interests and views of stakeholders (S3-SBM2) .....	54
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S3-SBM3) .....	54
Policies relating to affected communities (S3-1) .....	55
Affected community engagement processes on impacts (S3-2) .....	55
Processes for remedying negative impacts and channels for affected communities to express concerns (S3-3) .....	55
Interventions on impacts and risk management for affected communities (S3-4).....	56
Objectives related to the management of impacts and significant risks (S3-5).....	56
<b>CONSUMERS AND END USERS .....</b>	<b>56</b>
Interests and views of stakeholders (S4-SBM 2) .....	56
Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S4-SBM 3) .....	56
Policies related to consumers and end-users (S4-1) .....	57
Consumer and end-user engagement processes on impacts (S4-2) .....	57
Remediation mechanisms and communication channels for end users (S4-3) .....	57
Interventions on impacts and risk management for end users (S4-4, 5).....	57
<b>GOVERNANCE INFORMATION.....</b>	<b>59</b>
<b>BUSINESS CONDUCT .....</b>	<b>59</b>

Role of administrative, management and control bodies (G1- GOV 1).....	59
Description of processes to identify and assess relevant impacts, risks and opportunities (G1- IRO 1) .....	59
Policies on business culture and business conduct (G1-1) .....	60
Supplier Relationship Management (G1-2).....	61
Prevention and detection of bribery and corruption (G1-3).....	61
Cases of active or passive corruption (G1-4) .....	62
Payment Practices (G1-6) .....	62
<b>ANNEX A .....</b>	<b>63</b>

# GENERAL INFORMATION

## ESRS 2 GENERAL INFORMATION

### General criteria for preparing the sustainability statement (BP-1)

The Corporate Sustainability Reporting Directive (CSRD) is the European directive aimed at improving, enriching and standardizing sustainability reporting among European companies. The legislation provides for the use of the European Sustainability Reporting Standards (ESRS) for the preparation of the sustainability statement.

In previous years, the group had already drawn up two sustainability reports (in the years 2022 and 2023 respectively), inspired by GRI principles.

During 2024, the De Wave group embarked on a path of alignment with the requirements of the CSRD, and this report represents the first reporting exercise inspired by the new ESRS principles, prepared on a voluntary basis, pending the stabilization of the regulatory framework.

This objective has led to a considerable commitment to improve the data collection process and ensure homogeneity and completeness of the data points among all the companies of the group.

De Wave has prepared this sustainability statement on a consolidated basis, considering the same scope of financial consolidation. The companies included in the declaration are the parent company De Wave and all the companies controlled by it directly and indirectly:

- De Wave Srl
- De Wave Polska Spzoo
- Precetti Inc
- Precetti Pte
- PM 4.0 Srl
- PM 5 Srl
- Mobil Line Srl
- Wingeco Srl
- Tecnavi Srl
- Inoxking Srl

For the analysis of the double materiality and the drafting of the sustainability statement, De Wave analyzed its value chain in its entirety. This has led to the identification of impacts, risks and opportunities not only for the group's own operations but also for those upstream and downstream in the value chain.

For the purposes of drafting this document, it was not necessary to omit any information corresponding to intellectual property, know-how or innovation results

## Circumstantial Disclosures (BP-2)

The definition of time horizons adopted in this document is in line with the requirements of section 6.4 of ESRS 1:

- Short period: calendar year (coinciding with the fiscal year)
- Medium term: 1 to 5 years
- Long-term: over 5 years

For the evaluation of the quantitative data relating to the value chain (specifically, for the calculation of categories 3.01 and 3.02 of Scope 3) the economic values of the different categories of goods and services were used.

All the values represented in the quantitative sections come from certain and punctual data. The few cases in which it was necessary to proceed with proportions or the figure does not refer to the entire perimeter of the group, but only to some companies, were appropriately highlighted.

In relation to the information provided within each thematic section relating to the "Expected financial effects of risks and potential opportunities", the possibility of omission guaranteed by the *phase-in is used*.

## Role of administrative, management and control bodies (GOV-1)

De Wave has identified the following management and control bodies:

### Board of Directors

The current Board in office was appointed by the Shareholders' Meeting on 29 June 2022, for an unlimited duration, and is composed of 5 members, three of whom belong to the Private Equity Fund that controls the group.

Society	Composition of the Board of Directors	Date of appointment	Average age	% of gender in the Board of Directors
DE WAVE S.R.L.	President of the Board of Directors: POMPILIO RICCARDO Managing Director MACHIERALDO MATTEO FRANCESCO Councillor SIGLER MARY ANN Councillor KALAWSKI EVA M Councillor HOLLAND JOHN GERALD	September 29, 2022	56 years	40% women 60% men

The following is a representation of the diversity within the boards of directors of all the companies in the group

Executive members are defined as members who hold an executive role within a company; it is understood that the same person could be an executive member in one company, and not an executive member in another.

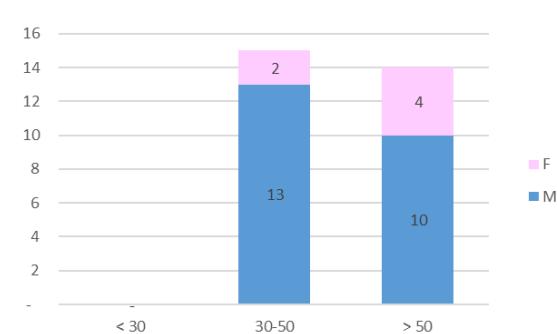
2-GOV1   21.a	Esecutivi	Non esecutivi	TOT
De Wave Srl	2	3	5
De Wave Polska	-	2	2
Precetti USA	1	4	5
Precetti PTE	1	1	2
PM 4.0	3	1	4
PM 5.0	1	-	1
Palamar	1	2	3
Tecnavi	1	2	3
Wingeco	1	2	3
Inoxking	1	2	3
	<b>12</b>	<b>19</b>	<b>31</b>

There are no workers' representatives in the administrative, management and control bodies.

All the members of the Boards of Directors of the group companies come from the sector in which their respective companies operate and are therefore individuals who have gained strong experience in their respective sectors (shipbuilding, manufacture of light and heavy carpentry, naval plant engineering, production of doors and windows, woodworking, ...); in most cases they either also hold the position of CEO, or they are the founders or entrepreneurs who, in some cases for decades, managed their respective companies before they became part of the group. This guarantees the group's management a deep competence and strong links with other players in the sector, whether suppliers or customers.

The following tables represent gender and age diversity within the boards of directors of group companies:

2-GOV1   21.d	M	F	TOT	%
< 30	-	-	-	0,0%
30-50	15	2	17	54,8%
> 50	10	4	14	45,2%
	<b>25</b>	<b>6</b>	<b>31</b>	<b>100,0%</b>



2-GOV1   21.d	2022	2023	2024	%
Uomini	24	24	25	80,6%
Donne	6	6	6	19,4%
<b>Totale</b>	<b>30</b>	<b>30</b>	<b>31</b>	<b>100,0%</b>

"Independent" members of the Board of Directors are considered to be those who are neither employees of the De Wave group nor have executive positions, and therefore also those who belong to the companies of the Platinum Equity fund.

The table on the side shows the number and gender breakdown of the boards of directors of all the companies in the group.

2-GOV1   21.e	Interni	Indipendenti	TOT
De Wave Srl	2	3	5
De Wave Polska	2	-	2
Precetti USA	3	2	5
Precetti PTE	1	1	2
PM 4.0	4	-	4
PM 5.0	1	-	1
Palamar	3	-	3
Tecnavi	3	-	3
Wingeco	3	-	3
Inoxking	3	-	3
	<b>25</b>	<b>6</b>	<b>31</b>
	80,6%	19,4%	

#### - **Board of Statutory Auditors**

- o The members of the Board of Statutory Auditors are:
  - President: NICODEMI LUCA
  - Mayor: MIGLIETTA ANGELO
  - Mayor: FASCE PAOLO
  - Alternate Auditor: REDAELLI FABRIZIO
  - Alternate Auditor: BARISONE ELISABETTA
- o All members are registered in the register of statutory auditors.

#### - **Supervisory body**

- o De Wave S.r.l has established a body with supervisory and control functions to ensure the functioning, effectiveness, adequacy and compliance with the organisation, management and control model adopted, in order to prevent offences from which administrative liability may arise
- o In the exercise of its functions, the Body operates according to the principles of autonomy and independence.
- o The statutory auditors are joined by PricewaterhouseCoopers S.p.A., as statutory auditor also for the companies Tecnavi, Mobil Line and PM 4.0

#### - **Compensation Committee**

- o The committee is composed of the CEO, the CFO and the group HR Manager and meets monthly in order to define compensation policies, evaluate the performance of top management figures and in general ensure fair and adequate remuneration for its employees. The committee is composed of:
  - Marco D'Alessandro – Group HR manager
- o Matteo Machieraldo – Group CFO
- o Riccardo Pompili – Group CEO

- **ESG Committee**

The De Wave group has decided to set up an ESG Committee, which will be entrusted with the task of integrating sustainability principles into the company's strategy and operations. The Committee, which will be formally established in 2025, will play an advisory and propositional role towards the Group's Board of Directors. The main tasks of the Committee will be:

- Definition of the Group's Sustainability Strategy and Policies and monitoring of their implementation: starting from the identification of the IROs and the definition of the relevant issues, the Committee develops and proposes to the Board of Directors the ESG strategy, the respective related objectives as well as the main policies on the management of the most relevant matters. In addition, it is committed to measuring, during the year, progress on the main KPIs and deviations from targets and/or historical values;
- Monitoring and management of ESG risks: supervises the identification and monitoring of environmental, social and governance risks, ensuring their progressive integration within the company's risk management system (ERM);
- Stakeholder reporting and engagement: coordinates the preparation of the Sustainability Report and ensures, where required, the adequate involvement of stakeholders in the processes (double materiality, information to the workers' representative, etc.);
- Promotion of the Group's ESG culture: it is committed to spreading the culture and attention to sustainability issues within the group's companies, through the promotion of awareness-raising, information and specific training initiatives.
- Collaborate in the integration of new companies within the Group's sustainability path, in the reporting process and in the definition of objectives.

The Group's Management has expressed its intention to embark on a virtuous path on the environmental, social and internal governance fronts, and at the same time to improve its reporting process, to make it increasingly accurate and transparent.

To this end, it has trained internal resources dealing with sustainability reporting, and hired qualified consultants to address specific issues, especially with regard to the new requirements of the CSRD. The members of the Board of Directors have not yet obtained specific training on ESG issues, but it should be emphasized that the members of the SB are instead highly qualified in the field of sustainability.

### **Information provided to administrative, management and supervisory bodies on sustainability matters (GOV-2)**

The Impacts, Risks and Opportunities (hereinafter "IROs"), in their broadest sense given by the CSRD, were identified at the end of 2024, so during the year there had not yet been formalized moments in which the Management and the control bodies were informed and made decisions regarding IROs. De Wave proposes, during 2025, to instruct a process that provides for a formal involvement of the management, administration and control bodies on the subject of sustainability.

In any case, all Italian companies draw up a Risk Assessment Document (DVR), filed on the group's HSE portal.

In compliance with the legal obligations dictated by Legislative Decree 81/2008 (Article 35), the Health, Safety and Environment Manager meets, on an annual basis, with the employer, the competent doctor and the workers' representative (RLS, RLSU) for verification and alignment.

In specific cases such as new acquisitions by the group or the inclusion of new plants and equipment in production sites, it may be necessary to convene an extraordinary meeting.

For all companies certified (or candidates for certification) according to standards 45001 and 14001 there is an additional moment of meeting: the Management Examination, which takes place in February and which involves the examination of the previous year's reporting and the definition of an improvement program for future years, an analysis of risks and future objectives.

The Management intends to concretize its commitment to improving health and safety conditions in the workplace and to environmental protection through precise and defined improvement projects.

During 2024, De Wave undertook to create and disseminate the HSE MANAGEMENT management software among its Italian subsidiaries, aimed at the application of the IMS - HSE Management - currently in the consolidation phase. The program allows all functions to participate in the Management System, sharing the information and records of their competence, and the HSE function to monitor the correct implementation of the SG in the Company.

### Integration of sustainability performance into incentive systems (GOV-3, 4)

At this stage, the group has not yet incorporated sustainability metrics and objectives into the incentive system for members of the management, administration and control bodies.

De Wave aims to focus in this phase, before the cogency of the CSRD, on further improving and standardizing the data collection process, so that they can then provide a stable, reliable, and homogeneous database throughout the group, in order to be able to be used as a basis for the calculation of MBOs.

De Wave, not yet subject to due diligence on sustainability issues, has not put in place procedures in this regard.

### Risk Management and Internal Controls on Sustainability Reporting (GOV-5)

In 2024, the group has not yet started or formalized an audit process on the ESG data collected.

In fact, until now, in order to ensure the accuracy and reliability of the data, the goal has been to minimize the amount of information provided manually, and on the contrary maximize the amount of data coming from automatic system extractions. By way of example:

- All personnel data comes from extractions from the group's Business Intelligence system, and **98.4%** of the master data are fed directly by the HR systems of the various companies, in order to eliminate manual intervention;
- The majority of fuel consumption data comes from automatic extractions of fuel card systems;
- Most of the data relating to air travel and overnight stays comes automatically from the systems of travel agencies.

For the future, the group is committed to formalizing the compilation rules and setting up a sample check process on the data.

### Strategy, Business Model and Value Chain (SBM-1)

The De Wave group operates in the shipbuilding sector, where it creates interiors for cruise ships and yachts. The activities include both the preparation of spaces inside newly built ships (**New Build**), and the renovation of spaces in ships already in operation (**Refitting**).

The main customers are the Shipyards, or the shipping companies. Through its subsidiaries, De Wave provides the following services:

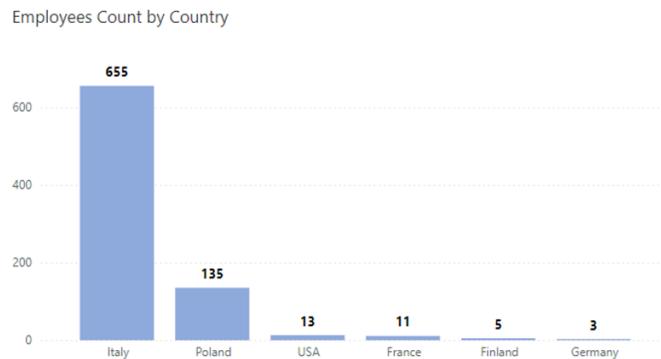
- **Cabins:** design, production and outfitting on board the cabins
- **Bathrooms:** design, production and fitting out on board the bathrooms
- **Public areas:** design and fitting out of public areas, such as dining rooms, swimming pools, saunas, stairs, outdoor areas, ...
- **Catering:** design, production and assembly of kitchens on board
- **Systems:** design and installation of air conditioning, heating, cooling and fire-fighting systems
- **Glazing:** design, processing and installation of glass and aluminum cladding, windows, door frames and balustrades, glass walls and other elements for the naval and construction sectors.
- **Service:** assistance and repair on all the above areas



De Wave has not defined sustainability strategies or objectives that are specifically tied to individuals, products, services, customer classes or geographies.

De Wave is not in the following industries: fossil fuels, chemical manufacturing, controversial weapons, tobacco cultivation and production.

At the end of 2024, the group had 822 employees, distributed in the following countries:



The following diagram summarises the value chain of De Wave and its subsidiaries:

UPSTREAM	OWN OPERATION	DOWNSTREAM
<p><b>Fornitura di servizi:</b></p> <ul style="list-style-type: none"> <li>- Servizi esterni di trasporto, per il trasporto di merce dai fornitori, inter-company e interno al cantiere</li> <li>- Subappalto di manodopera specializzata</li> <li>- Spazi per le attività di cantiere (Fincantieri, Ente Bacini, Mariotti, ecc..)</li> <li>- Servizi di progettazione (architetti, ingegneri, ecc..)</li> <li>- Utenze, per le attività in uffici e cantieri</li> </ul> <p><b>Fornitura di beni :</b></p> <ul style="list-style-type: none"> <li>- Materiale per la produzione dei pannelli (lamiere, lana di roccia, ecc..)</li> <li>- Materiale per la produzione di mobili (legno, vinilico, ecc..)</li> <li>- Attrezzature e strumenti di lavoro</li> <li>- Componenti delle strutture da assemblare (banchi bar, SPA, aree sport, ecc..)</li> <li>- Componenti per la realizzazione degli impianti di refrigerazione e condizionamento (tubature, isolanti, batterie, motori, gas e liquidi refrigeranti)</li> <li>- Componenti e materiale elettrico</li> <li>- Componenti in vetro e alluminio per la realizzazione di finestre, vetrate e balaustre</li> <li>- Vernici e prodotti chimici</li> </ul>	<p><b>Servizi:</b> allestimento di nuove aree a bordo (<b>New Build</b>) e ristrutturazione di aree esistenti (<b>Refitting</b>):</p> <ul style="list-style-type: none"> <li>- Progettazione interni (bagni, cabine, aree catering, aree pubbliche, ...)</li> <li>- Project management</li> <li>- Montaggio e installazione delle strutture interne</li> <li>- Assemblaggio e installazione di impianti di refrigerazione e condizionamento (Tecnavi)</li> <li>- Assemblaggio e installazione di vetrate, balaustre, finestre e facciate continue (Wingeco)</li> <li>- Assistenza, riparazione, manutenzione di aree ed impianti</li> </ul> <p><b>Produzione:</b></p> <ul style="list-style-type: none"> <li>- Ingegneria, progettazione e realizzazione dei Mock-up</li> <li>- Produzione degli assemblati per la realizzazione delle aree bagno</li> <li>- Produzione dei pannelli per pareti, soffitti e pavimenti</li> <li>- Produzione di mobili per l'arredamento interno di navi e yacht (Mobil Line)</li> <li>- Produzione di involucri, serramenti, balaustre, finestre, elementi di chiusura in vetro e alluminio (Wingeco)</li> </ul>	<p><b>Erogazione di servizi:</b></p> <ul style="list-style-type: none"> <li>- Armatori, proprietari di navi da crociera e yacht</li> <li>- Cantieri navali</li> <li>- General Contractors, per lavori nel settore edile</li> </ul> <p><b>Allestimento e installazione</b></p> <ul style="list-style-type: none"> <li>- Trasporto dei sistemi realizzati presso i cantieri</li> <li>- Installazione dei sistemi realizzati</li> <li>- Allestimento ed arredamento interno di navi e yacht</li> </ul> <p><b>Gestione dei rifiuti:</b></p> <ul style="list-style-type: none"> <li>- Raccolta, trattamento e smaltimento dei rifiuti a valle dell'allestimento</li> </ul>

To arrive at the definition of the Value Chain, De Wave conducted a series of interviews with all managers of the business areas and staff functions, in order to map the activities of each department and the upstream and downstream relationships with internal and/or external actors.

The upstream section of the value chain refers to the activities of:

- Procurement of materials (involved in the production processes in the factories and outfitting on board)
- Procurement of services (mainly transport and external workforce employed in assembly and outfitting activities on board)
- The upstream section concerns the activities of De Wave's clients, mainly shipyards and shipping companies, and their end users, i.e. cruise ship passengers and yacht owners and passengers.
- The group's activities are oriented towards the generation of long-term value for customers, investors and all other stakeholders. The Group's commitment aims to continuously improve the quality of its products and services and to promote sustainable development from an economic, social and environmental point of view, offering growth opportunities for employees and the communities concerned.

## Interests and Views of Stakeholders (SBM-2)

The process carried out for the analysis of double materiality started from the study and identification of the relevant stakeholders, whether they are individuals or groups – both internal and external to the organization – with the ability to influence the decisions and actions of the company, but who can also be impacted by them.

2024 is the first year of double materiality analysis: the group focused on the methodological aspects of the analysis, using only internal management assessments; In the next two years, it aims to further enrich the analysis by also involving external stakeholders to whom it will submit its assessments for further verification and comparison.

The main stakeholders for De Wave are:

- Employees: with regard to the issues of remuneration, training, safety, prospects for professional and economic growth
- Suppliers: fairness and transparency in relationships, compliance with payment terms
- **Customers** (shipyards and shipping companies): guarantee compliance with times and quality levels, guaranteeing absolute compliance with the safety parameters of the products and the environments installed on board
- Shareholders: defend and increase the value of the group, ensure transparency and accuracy in communications. The group is controlled by the Platinum Equity fund
- The financial system: **banks** and **lenders**
- The **communities concerned**

At the value chain level, relevant stakeholders are distinguished as linked to "own operations", or "upstream" or "downstream", specifying however that some groups – such as the environment, the local community and public institutions and bodies – are characterized by being important throughout the value chain.

For own activities, different types of stakeholders are relevant, which include: employees, owners and partners, certification bodies, banks and credit institutions, peers and competitors.

On the other hand, at the upstream level, several subjects have been identified who are influenced by the Group or who can influence it; These include: shipyards, contractors, workers in the value chain and all types of suppliers (transport services, design, metal materials, insulators, glass and fiberglass, furniture, plastic material and others).

Finally, downstream in the chain, the interests of: shipowners, shipyards, value chain workers and general contractors are taken into account.

### Relevant impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3)

Impacts, risks and opportunities have been identified through the analysis of Double Materiality, along the entire value chain, thus considering not only the group's own activities, but also those of the upstream and downstream players in the value chain.

The IROs identified, of an environmental, social and governance nature, are set out in detail within each thematic area in the remainder of the document.

De Wave has carried out an initial assessment and rough quantification of the potential and expected financial effects related to the risks and opportunities identified. At the moment, it is not considered that these data add value to sustainability reporting and therefore, using the derogation option offered by the *phase-in*, they are not represented either in this section or in the relevant sections of each chapter.

### Identification of relevant impacts, risks and opportunities (IRO-1)

The double materiality matrix makes it possible to identify relevant IROs, assessing their importance both internally (how they affect the company) and externally (how they affect stakeholders and the environment).

The process of determining impacts, risks and opportunities was carried out according to the following methodology:

- identification of the geographical perimeter in which De Wave and all its subsidiaries operate;
- identification of possible stakeholders, distinguishing between those who intervene upstream, downstream of the value chain, or on their own activities;
- definition of the sectors and activities present in the three phases of the value chain;
- identification of the material topics for each of the sectors previously identified, based on what is represented in the literature (ESRS, MSCI, SASB);
- comparative analysis of the material issues highlighted by peers and competitors;
- synthesis of these evaluations by cross-referencing this evidence and conclusive definition of the material themes for De Wave.

Subsequently, we moved on to the determination of the Impacts, Risks and Opportunities (IRO) starting from the double materiality matrix. This process involved an in-depth analysis that considered both impact and financial relevance.

#### ***Impact relevance***

As regards impacts, both own operations and upstream and downstream value chain activities were taken into account.

For each impact, the following were assessed:

- the intensity of the effects generated on the environment and people;
- the scope, i.e. the extent of the impact generated;
- the irremediability, i.e. the level of difficulty in remedying the impact generated, considering both the financial and temporal resources necessary to remedy the impact;
- the probability of occurrence;

Each of these parameters was defined on a scale of five levels, and this made it possible to obtain an assessment of the total severity also expressed on a scale of 1 to 5.

The impacts of the materiality analysis that achieved a materiality assessment above the average of the assessments provided for all themes and sub-themes, were considered "material" from an impact perspective and were therefore reported in accordance with the requirements of the ESRS.

#### ***Financial significance***

Risks and opportunities were considered both in connection with external dependencies and impacts.

The assessment of the magnitude of each risk/opportunity was carried out by estimating the extent of the possible impact in percentage terms on EBITDA, and then assigning a value from 1 to 5 (from very low to very high), depending on whether the risk/opportunity reached the thresholds of 1%, 2%, 3%, 4%, 7% of the Group's EBITDA respectively.

2024 is the first year that De Wave determines its own double materiality matrix and IROs. So there is still no revision process of the same. De Wave aims to involve external stakeholders in the next revisions.

There is still no integration of the process of identifying and evaluating IROs into the overall management processes of the company.

The intersection of these evaluations has resulted in the matrix of double materiality, which is represented in each chapter, for the topics of competence.

#### **Disclosure requirements of ESRS (IRO-2)**

#### ***Table of Contents***



- The list of contents reported in compliance with the ESR principles is set out in **Annex A**.

#### ***Omissions and phase-ins***

- *E1-7 - GHG removals*: not applicable as the group does not carry out GHG removals or storage, nor has it purchased carbon credits.
- *E1-8 - Domestic carbon pricing*: not applicable as the group does not use carbon pricing mechanisms
- *E4 – Biodiversity*: the group's activities do not have a direct and significant impact on biodiversity and consequently the issue has not been the subject of particular strategies, policies or procedures so far, nor is it considered necessary to implement biodiversity mitigation measures. In particular, no impacts on species at risk of extinction are detected, nor risks to biodiversity or dependencies on it. Furthermore, referring to the mapping offered by 2000, no European company site of the group is located within biodiversity-sensitive areas. As a result, it was also never necessary to conduct consultations with the communities concerned on sustainability assessments of biological resources and ecosystems.
- *E1-9, E2-6, E3-5, E5-6 - Expected financial effects*: the derogation granted by the *phase-in is used*.
- *S1-8 – Coverage of collective bargaining and social dialogue*: omitted as non-relevant sub-themes related to the DR in question, i.e. "Collective bargaining", "Social dialogue" and "Freedom of association"
- *S1-17 – Human Rights Incidents, Complaints, and Serious Human Rights Impacts*: Omitted as non-relevant sub-themes related to the DR in question, namely "Measures Against Violence and Harassment in the Workplace," "Forced Labor," and "Child Labor."
- *G1-5 – Political influence and lobbying activities*: Omitted as the sub-theme related to the DR in question, i.e. "Political influence and lobbying activities"
- In general, all voluntary Data Points (DPs) have not been reported, with the exception of those situations in which it was considered useful to explain them, for a better quality of information.

## MINIMUM DISCLOSURE REQUIREMENT ON POLICIES AND ACTIONS

### Policies adopted to manage material sustainability issues (MDR-P)

De Wave has adopted a Code of Ethics, an integral and substantial part of its Organisational and Management Model, which sets out the principles to which the conduct of each of the recipients must comply, i.e. directors, statutory auditors and all members of the corporate bodies as well as the company's employees, including managers, and collaborators and consultants acting in the name and/or on behalf of the Company.

This document recommends avoiding any action that could lead to unlawful pressure or, in any case, undue influence on the activities of officials or public service officers of a public administration or that could undermine the independence of judgment and/or decision-making of third parties

The document also specifically addresses issues related to corruption, abuse, discriminatory treatment, abuse and in general conduct against ethics.

Over time, De Wave has then formalized ad hoc policies to address these specific issues. Below is a list of the policies developed so far and available on the company website.

De Wave aims to continue to enrich the body of policies and disseminate it among the companies of the group.

POLICY	CONTENUTI CHIAVE	DISPONIBILITÀ
<b>Ambientale</b>	<ul style="list-style-type: none"> <li>- Garantire il pieno rispetto delle normativa vigente</li> <li>- Operare ogni possibile sforzo per proteggere l'ambiente e prevenire l'inquinamento</li> <li>- Impegno nel mitigare progressivamente l'impatto ambientale</li> </ul>	- Sito web aziendale
<b>Anti-ritorsione</b>	<ul style="list-style-type: none"> <li>- Prevenire e combattere ogni forma di ritorsione</li> <li>- Garantire la possibilità di segnalare eventuali illeciti, di carattere legale o etico, senza timore di ritorsioni</li> <li>- Stabilire un canale per segnalare episodi di ritorsione</li> </ul>	- Sito web aziendale
<b>Diversity, Equity and Inclusion</b>	<ul style="list-style-type: none"> <li>- Garantire pari opportunità per tutti</li> <li>- Creare una cultura inclusiva</li> <li>- Riconoscere e rispettare le individualità di ognuno</li> </ul>	- Sito web aziendale
<b>Qualità</b>	<ul style="list-style-type: none"> <li>- Garantire la qualità dei processi interni e dei servizi e prodotti forniti all'esterno</li> <li>- Impostare un Sistema ed un Processo per la gestione della Qualità a livello di gruppo</li> <li>- Diffondere la cultura della qualità e del miglioramento continuo in azienda</li> </ul>	- Sito web aziendale
<b>Salute e Sicurezza</b>	<ul style="list-style-type: none"> <li>- Garantire condizioni di lavoro sicure e salutari per tutti i dipendenti ed i lavoratori esterni</li> <li>- Osservare il pieno rispetto della normativa in tema di salute e sicurezza</li> <li>- Diffondere costantemente la cultura della sicurezza presso i propri dipendenti e le maestranze esterne coinvolte</li> </ul>	- Sito web aziendale
<b>Whistleblowing</b>	<ul style="list-style-type: none"> <li>- Fornire un canale sicuro per le segnalazioni</li> <li>- Garantire l'anonimato dei soggetti segnalatori</li> <li>- Proteggere i segnalatori da azioni ritorsive</li> <li>- Garantire una tempestiva ed adeguata gestione delle segnalazioni</li> </ul>	- Sito web aziendale

### Actions and resources related to relevant sustainability issues (MDR-A)

At this stage of initial alignment with the CSRD, the group has not yet set out an action plan, related metrics, and objectives underlying ESG policies.

However, although not yet part of a formalised plan, during 2024 the group has already committed to a series of actions aimed at achieving concrete results on various fronts. Regarding actions on the environmental front, see specifically paragraph E1-3. More generally on the HSE front, several projects were successfully completed in 2024, which included:

- RINA relief closure
- installation of photovoltaic panels
- ISO 14001 and ISO 45001 certification of the companies Tecnavi and Wingeco
- improvement of the chemical risk assessment for the Monfalcone plant

- sale of stone wool waste to the supplier, instead of disposal as waste

For 2025, improvement projects have been launched to:

- Further closure of RINA surveys
- Enhancement and improvement of the implementation of the HSE Management software
- ISO 14001 and ISO 45001 certification of two other companies of the group
- renewal of the car fleet with new purchases of electric / hybrid cars
- analysis of electricity supply and study of the increase in the proportion of energy from renewable sources
- analysis of the energy and CO2 impact of company IT activities and study of possible reductions (e.g. selection of "green" providers)

The actions, metrics and targets developed to date are reported within the specific thematic areas.

# ENVIRONMENTAL INFORMATION

## Taxonomy – Disclosure pursuant to Article 8 of Regulation (EU) 2020/852

During 2024 and as part of the process of alignment with the CSRD regulation, the De Wave Group launched an initial exercise aimed at verifying the eligibility and subsequent alignment of its activities with those required by the European Taxonomy. Eligible items include, but are not limited to:

- Upgrading maritime and coastal freight and passenger transport (6.12)
- Repair, requalification and remanufacturing of goods that have already been used for a customer's intended purpose (5.1)
- Sale of spare parts (5.2)
- Installation, maintenance and repair of renewable energy technologies (7.6)

Given the suspension of the cogency, initially scheduled for 2025, introduced with the Omnibus decree, it was decided to complete the exercise internally without giving evidence in the remainder of this report, pending the consolidation of the legislation and the redefinition of the requirements.

## **E1** CLIMATE CHANGE

### Integration of sustainability performance into incentive systems (E1-GOV 3)

The group has not yet incorporated ESG indicators into the incentive system of the group's administrative and management bodies.

### Climate Change Mitigation Transition Plan (E1-1)

De Wave Group has not yet adopted a transition plan for climate change mitigation that is able to guarantee compatibility of the strategy and business model with a sustainable economy and with the desire – provided for by the Paris Agreement – to limit global warming to 1.5°C as well as to achieve climate neutrality by 2050.

Although it operates in a sector that has a significant impact on the environment, with reference to climate change mitigation, the Group has limited influence on upstream and, above all, downstream activities. De Wave Group has therefore chosen to start focusing mainly on actions and policies regarding its own operations, therefore that can provide a concrete contribution to the achievement of the goals desired by the Paris Agreement.

During 2024, the commitment focused on setting up a complete and correct calculation of its emissions, at group level, so that it provides a certain and reliable metric on which to measure future progress and on the basis of which to set emission reduction targets.

## Relevant impacts, risks and opportunities and their interaction with the strategy and business model (E1-SBM 3)

In the 2024 Double Materiality Matrix (DMA) and related analysis, climate-related IROs (in relation to both climate change adaptation and mitigation) were specifically assessed. The business model, current activities and places where the group operates are exposed to a low level of climate risk, therefore it was not necessary to proceed with a structured resilience analysis.

## Description of processes for identifying and assessing relevant climate-related impacts, risks and opportunities (E1-IRO 1)

The group's activities involve the production, transport and management of large quantities of materials, and the downstream activities of customers (navigation of cruise compartments and yachts) involve significant emissions; consequently, the impacts are current and cross the entire value chain:

	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
Mitigazione dei cambiamenti climatici	attraverso il normale svolgimento delle proprie attività, genera emissioni di CO2 nell'atmosfera	−	Attuale	✓	✓	✓	✓	
Energia	L'alimentazione di attrezzi, macchinari, edifici, implica un significativo consumo di energia	−	Attuale	✓	✓	✓	✓	
Adattamento ai cambiamenti climatici	De Wave, a causa dei sempre più frequenti eventi meteorologici estremi causati dal cambiamento climatico, potrebbe subire danni fisici alle proprie strutture, quali uffici e stabilimenti, e incorrere in maggiori costi assicurativi.	R	Potenziale		✓			✓
Mitigazione dei cambiamenti climatici	L'introduzione di una normativa maggiormente severa sulla limitazione della navigazione per ridurre le emissioni in atmosfera, potrebbe portare ad una diminuzione della domanda per De Wave.	R	Potenziale			✓		✓
"	A causa della necessità di perseguire gli obiettivi di riduzione delle emissioni generate, De Wave può incorrere in un aumento dei costi operativi dovuti all'applicazione delle soluzioni necessarie al raggiungimento degli obiettivi stessi.	R	Potenziale		✓		✓	
Energia	De Wave, attraverso interventi di efficientamento energetico, potrebbe ridurre i costi sostenuti per il consumo energetico e la sua vulnerabilità alla volatilità dei prezzi dell'energia.	O	Potenziale		✓		✓	

## Climate Change Mitigation and Adaptation Policies (E1-2)

The group has an environmental policy, the main objectives of which are to ensure full compliance with current legislation, to make every possible effort to protect the environment and prevent pollution, and to commit itself to progressively mitigating the environmental impact.

In particular, environmental policy aims to respond to the need for greater use of renewable energy and at the same time reduce energy consumption by avoiding waste and dispersion.

The aim is to create infrastructure and introduce modern systems to achieve energy savings in terms of optimising the heating and cooling system.

## Climate change policy actions and resources (E1-3, 4)

Although it has not previously defined specific climate change targets, during 2024 De Wave has undertaken major investments to reduce its energy consumption and increase self-production from renewable sources. The main results achieved are as follows:

Iniziativa	Capex	Opex
Realizzato un impianto fotovoltaico da 291 KW nello stabilimento di Monfalcone, capace di coprire circa il 50% del fabbisogno energetico del sito	260 k	na
Realizzato un secondo impianto fotovoltaico da 50 KW nello stabilimento produttivo di Lipno, in Polonia	30 k	na
Rinnovato i contratti di fornitura di energia elettrica, passando ad una fornitura da fonti rinnovabili con garanzia di origine	na	na
Realizzato un nuovo impianto a condensazione per la generazione di acqua calda, con un'efficienza di gran lunga superiore rispetto al precedente, e con una riduzione dei consumi superiore al 40%	118 k	na
Installato nuovi macchinari nello stabilimento produttivo di Monfalcone, con un'efficienza energetica del 35% rispetto ai vecchi macchinari sostituiti	1.318 k	na

## Energy consumption and energy mix (E1-5)

Below is evidence of energy consumption and energy mix, relating to all the companies of the group:

E1-5   37	2024	2023	%
1) Consumo di combustibile da petrolio grezzo e prodotti petroliferi (MWh)	2.251,2		0,0%
2) Consumo di combustibile da gas naturale (MWh)	1.528,2	1.337,9	14,2%
3) Consumo di combustibili da altre fonti non rinnovabili (MWh)	969,7		0,0%
4) Consumo di energia elettrica, calore, vapore fonti fossili, acquistati o acquisiti (MWh)	1.747,8	2.026,1	-13,7%
<b>6) Consumo totale di energia da fonti fossili (MWh)</b>	<b>6.496,8</b>	<b>3.364</b>	<b>93,1%</b>
<i>Quota di fonti fossili sul consumo totale di energia (%)</i>	<i>95,2%</i>	<i>100,0%</i>	
9) Consumo di energia elettrica da fonti rinnovabili, acquistati o acquisiti (MWh)	222,2		0,0%
10) Consumo di energia rinnovabile autoprodotta senza ricorrere a combustibili (MWh)	107,4		0,0%
<b>11) Consumo totale di energia da fonti rinnovabili (MWh)</b>	<b>329,6</b>	<b>0,0</b>	<b>0,0%</b>
<i>Quota di fonti rinnovabili sul consumo totale di energia (%)</i>	<i>4,8%</i>	<i>0,0%</i>	
<b>Consumo totale di energia (MWh)</b>	<b>6.826,4</b>	<b>3.364,0</b>	<b>102,9%</b>

## Greenhouse gas emissions (E1-6)

	2024 (tCO <sub>2</sub> e)	2023 (tCO <sub>2</sub> e)	%
<b>Scope 1 GHG emissions</b>			
Gross Scope 1 GHG emissions	1.188,3	1.029,2	15%
<b>Scope 2 GHG emissions</b>			
Gross location-based Scope 2 GHG emissions	740,2	782,0	-5%
Gross market-based Scope 2 GHG emissions	983,5	1.139,2	-14%
<b>Scope 3 GHG emissions</b>			
1. Purchased goods and services	34.250,3	53.019,9	-35%
2. Capital goods	1.227,1	1.815,7	-32%
3. Fuel- and energy-related activities/services	331,8	299,9	11%
4. Upstream transportation and distribution	5.640,5	12.106,5	-53%
5. Waste generated in operation	245,3	13,0	1784%
6. Business travel	2.751,2	2.071,6	33%
7. Employee commuting	756,9	662,3	14%
<b>Total Scope 3 GHG emissions</b>	<b>45.203,0</b>	<b>69.989,0</b>	<b>-35%</b>
<b>Total GHG emissions</b>			0%
<b>Total GHG emissions (location-based)</b>	<b>47.131,5</b>	<b>71.800,2</b>	<b>-34%</b>
<b>Total GHG emissions (market-based)</b>	<b>47.374,8</b>	<b>72.157,4</b>	<b>-34%</b>

## SCOPE 1

### Scope 1 Reporting Principles

- **1.01 Stationary Combustion:** This category includes the burning of fossil fuels such as natural gas, coal, and oil to produce heat and power in equipment. Within the group, the consumption of gas (or fuel) for heating for each individual site of each group company is recorded and these are then multiplied by the DEFRA 2024 emission factors.
- **1.02 Mobile combustion:** These emissions are produced by the use of fuels for transport in vehicles owned or controlled by the company. In the De Wave group, each company reports the liters of fuel consumed for each type of fuel (petrol, diesel, biodiesel, LPG, ...). These values are then multiplied by the appropriate DEFRA 2024 coefficients. In almost all cases, consumption comes from the extraction of fuel card management systems in concession to employees. Where this is not possible, each company reports the litres consumed by type of fuel.
- **1.03 Process emissions:** This category includes the combustion of fossil fuels such as natural gas, coal, and oil to produce heat and power in equipment: this category does not apply to group activities.

- **1.04 Fugitive emissions:** These are emissions that are released through inadvertent leaks from equipment or structures. Within the De Wave group, they are calculated by applying the DEFRA 2024 emission coefficients specific to each type of gas/refrigerant liquid to the restoration values in the air conditioning systems of all group companies.

## SCOPE 2

- **2.02 Purchased energy – market based:** During 2024, the group signed new power purchase contracts with Certificates of Origin, in order to secure energy from renewable sources.

### Scope 2 Reporting Principles

- **2.01 Purchased energy – location-based:** starting from 2021, all group companies will report electricity consumption for each individual site on a monthly basis. Consumption (expressed in KWh) is then multiplied by the relevant IEA 2024 emission factors specific to each country.
- **2.02 Purchased energy – market based:** the same consumption in KWh recorded for the calculation of location-based emissions is then deducted from the quantities purchased from renewable sources (with Certificates of Origin) and then multiplied by the DEFRA 2024 emission factors, in order to obtain market-based emissions.
- **2.03 Heat or steam supply:** This category is not applicable to the De Wave Group, because it does not purchase either steam or heat for its processes.

## SCOPE 3

### Scope 3 Reporting Principles

- **3.01 Goods and services purchased:** the figure is calculated on the basis of the economic value of the goods and services purchased reported in the financial statements of all the companies in the group and multiplied by the emission factors of each product category. The 2022 EPA coefficients were used as emission factors, adjusted based on the ratio of USD/EUR purchasing power and then for the 2023 and 2024 inflationary factors.
- **3.02 Capital goods:** the greenhouse gas emissions associated with assets are calculated by multiplying the increase in the value of assets (i.e. the value of purchases of capitalized assets during the year) with the emission factor associated with that specific asset category. The emission factor is derived from the 2022 EPA tables, according to the same criterion used for goods and services.
- **3.03 Fuel and energy extraction:** the value of emissions related to fuel and energy consumption not yet included in scopes 1 and 2, have been calculated here by multiplying the consumption measured for scopes 1 and 2 by the DEFRA 2024 coefficients (section: WTT)

- **3.04, 3.09 Upstream transport and distribution:** the value of emissions is calculated starting from the economic purchase value of transport drawn from the financial statements of all the companies in the group and multiplied by the EPA coefficient of the "transport" category. The same methodology is then applied to downstream transport (although extremely less significant in terms of expenditure and therefore, emissions). De Wave aims to implement a new transport management application by 2025, in order to significantly increase the accuracy of the data, tracking each individual transport and its emissions calculated through a certified system.
- **3.05 Production waste and waste:** all group companies report the volumes of waste disposed of during the year and divided by category of waste according to the CER code. The figure is then further broken down by type of treatment, distinguishing between the six types of disposal or recycling provided for by the EFRS principles. The data comes from the MUD declarations of each company. The data thus divided are then multiplied by the DEFRA 2024 coefficient specific to each combination of material type and treatment type (section: *waste*).
- **3.06 Business travel:** emissions related to business trips are calculated by applying the specific DEFRA 2024 coefficients (section: *business travel*) respectively for: miles of air travel, km of train travel, hotel nights. The data on miles/km traveled and nights come, in the vast majority of cases, directly from the extractions from the booking systems of the agencies on which the group relies. In order to improve the accuracy of the data, all bookings made internally are also tracked directly by the travel office staff of the group companies. For hotel nights, the specific coefficient of each country in which the overnight stay took place is used.
- **3.07 Staff commuting:** during 2022, De Wave administered a detailed questionnaire to employees of all group companies to learn about home-to-work transport methods. The survey, which had recorded a response rate of 55.3%, collected information such as the weekly frequency of travel, the distance traveled, the vehicle used, and the power supply of the vehicle. In 2024, the group's employees grew, and it was decided to apply the same results of the first survey proportionally to the entire average population of the group in 2024 (818 employees). In view of the next 2025 financial statements, the group undertakes to carry out a second survey, involving all the companies that will be in the scope of consolidation at the end of 2025.

Non-relevant categories:

- **3.08 Purchase of leased assets:** the group uses the leasing tool exclusively for cars and machinery, for which Scope 1 and 2 emissions (consumption in litres of fuel and kWh of energy absorbed) are already accurately recorded. The purchase of leased assets is therefore excluded from the calculation because it would represent a double counting.
- **3.10 Processing of products sold:** This category (together with the two subsequent ones) is excluded from the calculation because the group, which produces cruiser and yacht interiors, in no way can influence the behavior of the final consumer on board, nor is it possible to collect statistics relating to the use of ships with an effort that is not totally disproportionate to the intended purpose, just as it is not possible to isolate the contribution of De Wave compared to the other parts of the ships, built by other subjects. It should also be noted that the group does

not build the engine part of the ships, which would instead have a more direct and measurable relationship with the emissions produced at sea.

- ***3.11 Use and use of the service/product:*** ditto as category 3.10
- ***3.12 End-of-life of products sold:*** ditto as category 3.10
- ***3.13 Granting of leased assets:*** this category is considered irrelevant because the group does not act as a lessor of leased assets.
- ***3.14 Franchise:*** this category is considered non-significant as the group is not part of and does not make use of franchise systems.
- ***3.15 Investments:*** this category is considered non-significant as there are no minority investments in companies that are not already included in the scope of Scope 1, 2 and 3 data collection and consolidation.

## E2

## POLLUTION

### Assessment of impacts, risks and opportunities related to pollution (E2-IRO 1)

Each site of the group is subject to an assessment of risks to health and safety and environmental impacts; where these risks are considered significant (typically production plants), a Single Environmental Authorization (AUA) is prepared; in which the activities of the plants in terms of discharges into the atmosphere or water are monitored and reported.

Both the equipment and the systems are subject to the check. With regard to chemical substances, the materials are subjected to an assessment both to align with the legal provisions and with the indications of safety and environmental certifications.

In temporary construction sites, supervision and monitoring are the responsibility of the client.

Given the low level of risk and potential impact, it is not considered necessary to carry out consultations with the communities concerned.

	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
Inquinamento dell'aria	De Wave, in modo diretto con i propri stabilimenti, ed indiretto tramite le attività di produzione dei fornitori e di navigazione delle navi, libera nell'aria sostanze inquinanti	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Inquinamento dell'acqua	Navi e yacht che De Wave contribuisce a realizzare, possono versare sostanze inquinanti nelle acque (sia in fase di navigazione, che di banchina)	<span style="color: orange;">-</span>	Attuale		<span style="color: green;">✓</span>	<span style="color: green;">✓</span>		
Inquinamento di organismi viventi e risorse alimentari	L'inquinamento dei mari causato dai mezzi che De Wave contribuisce a realizzare, può impattare negativamente sugli organismi viventi marini	<span style="color: orange;">-</span>	Attuale		<span style="color: green;">✓</span>	<span style="color: green;">✓</span>		
Sostanze preoccupanti	Le attività di realizzazione dei materiali e semilavorati a monte, così come le attività di smaltimento delle navi a valle, possono impiegare o liberare sostanze preoccupanti	<span style="color: orange;">-</span>	Potenziale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Microplastiche	Le attività di sabbiatura e verniciatura, possono disperdere nell'ambiente microplastiche derivanti dalle vernici.	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		
Inquinamento dell'acqua	L'introduzione di una normativa maggiormente stringente sulla riduzione dell'inquinamento del mare potrebbe portare a limitazioni per la navigazione di navi e yacht, con conseguenti minori richieste per l'organizzazione per l'erogazione dei propri servizi.	<span style="color: yellow;">R</span>	Potenziale		<span style="color: green;">✓</span>		<span style="color: green;">✓</span>	
Sostanze preoccupanti	L'organizzazione, in caso di un trattamento e smaltimento non corretto delle sostanze pericolose derivanti dai propri processi (produzioni, sabbiatura, verniciatura, ecc...), potrebbe incorrere in sanzioni e danni reputazionali.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		

### Pollution policies (E2-1)

The issue of pollution is dealt with within the environmental policy, which clearly expresses the objective of observing full compliance with the legislation and minimizing the pollution of water, soil and air.

In particular, it makes explicit reference to the use and dispersion of polluting chemicals, emissions into the air, and waste management.

## Pollution-related actions and resources (E2-2)

During the Management Examination, the final data are analyzed, against which an improvement program is drawn up, which for 2025 proposes the following objectives:

- RINA relief closure
- Enhancement and improvement of the implementation of the HSE Management software
- extension of ISO 14001 and ISO 45001 certification to other companies in the group
- rationalization of consumption through the preparation of information and posters
- renewal of the car fleet with new purchases of electric / hybrid cars
- analysis of electricity supply and study of the increase in the proportion of energy from renewable sources
- analysis of the energy and CO2 impact of company IT activities and study of possible reductions

## Pollution-related targets (E2-3)

The objectives consist in full compliance with the emission thresholds provided for by the AUAs of each site (in Italy). With reference to the typical production activities of the group (manufacture of steel and rock wool panels, woodworking, production of kit bathrooms, the typical emissions under control are:

- Air: exhaust fumes from chimneys
- Water: machine washing water

The ecological thresholds used are those defined by the AUA associated with each site.

The objectives consist in full compliance with legal obligations. No further targets have been set on a voluntary basis.

## Air, water and soil pollution (E2-4)

In the sites subject to AUA, the sampling required by current legislation is carried out on an annual basis, both at national, regional and, in some cases, municipal level.

The monitoring and verification activity is carried out, depending on the type, by internal employees and external professionals, who issue the necessary and mandatory certification for the competent bodies.

Typical cases of surveillance are constituted, for example, by the sampling of chimneys (Monfalcone plant), or by the washing water of machinery (Monfalcone, Vazzola), or of fine dust from woodworking (Mobil Line plant)

In the case of the use of chemical products, there is a verification and control process that starts from the purchase phase to disposal.

With regard to water pollution, there are filtering systems both during the cooling phase of the system and for the cleaning of the equipment used: both checks on the filters and sampling of waste water are carried out, followed by the necessary certifications.

Under no circumstances do emissions exceed the legal thresholds.

Over the course of the near future, evaluations will be made to understand the impact of microplastics (mainly related to sandblasting and painting activities) and the possibility of identifying a metric.

## Substances of concern and substances of very high concern (E2-5)

Full compliance with health and safety legislation is in itself a guarantee that substances of concern or very high concern are not released into the environment; Therefore, it has never been necessary to trace quantitative information on substances of concern used during production or purchased.

### E3

## WATERS AND MARINE RESOURCES

### Assessment of impacts, risks and opportunities related to water consumption and marine resources (E3-IRO-1)

	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
Consumo idrico	De Wave contribuisce al consumo idrico specie in relazione alle proprie attività produttive (lavaggio attrezzature e impianti), così come per il consumo nella catena di fornitura (legno, raffinazione del petrolio, lavorazione vetro e acciaio, ...) ed a bordo delle navi	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Scarichi idrici	Navi e yacht causano scarichi idrici che possono arrecare danno all'ambiente qualora contengano sostanze di scarso pericolosità	<span style="color: orange;">-</span>	Attuale			<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Scarichi di acqua negli oceani	L'organizzazione contribuisce indirettamente agli scarichi potenzialmente dannosi in mare aperto da parte delle navi di crociera e degli yacht.	<span style="color: orange;">-</span>	Attuale			<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	

The impacts of De Wave's own activities are limited to the issue of water consumption; To assess the severity of the impacts and the possible need to set targets and corrective actions, water consumption data were analysed.

Water consumption is punctually recorded for each individual site of each company in the group, and for each site the belonging to areas of water stress is verified.

As shown in the table in point E3-4|28, water consumption in areas of high or very high water stress corresponds to only 2.4% of total consumption, while almost 46% occurs in low-risk areas. For this reason, it is not considered necessary to proceed with particular actions to contain consumption in these areas

### Policies, targets and actions related to water consumption (E3-1, 2, 3)

Over time, the group has never considered it necessary to develop policies relating to water consumption and at the moment the actions are limited to constant monitoring of the same. In the future, the adoption of policies in this regard, or the definition of actions and objectives for the management of impacts, risks and opportunities (especially in relation to water risk areas) will be evaluated.

## Water Consumption (E3-4)

In terms of water consumption, it is relatively low in production activities and in general does not constitute a significant element within its own activities.

In particular, consumption in areas of high/very high water stress refers to a single site of the Mobil Line company located in Tuscany, which in 2024 recorded a consumption of only 64 cubic meters.

E3-4 (m3)	2024	%
Low	1.212	45,9%
Low - Medium	0	0,0%
Medium - High	1.363	51,6%
High	0	0,0%
Extremely High	64	2,4%
<b>Total</b>	<b>2.639</b>	<b>100,0%</b>

Almost 86% of consumption is concentrated in the group's five production plants:

E3-4 (m3)	2024	%
Stabilimenti	2.264	85,8%
Uffici/magazzini	375	14,2%
<b>Total</b>	<b>2.639</b>	<b>100,0%</b>

	dati in metri cubi	2024	2023	%
<b>E3-4   28.a</b>	Consumo idrico totale	2.639	6.713	-60,7%
<b>E3-4   28.b</b>	Consumo idrico (zone a rischio idrico)	64	-	0,0%
<b>E3-4   28.c</b>	volume totale di acqua riciclata e riutilizzata	-	-	0,0%
<b>E3-4   28.d</b>	volume totale di acqua immagazzinata	-	-	0,0%

In particular, during 2024 consumption fell significantly thanks to the identification and repair of a major leak in the pipes connecting to the water network of a plant, which led to a 60% reduction overall.

Water intensity is calculated as the ratio between water consumption in (cubic metres) and the value of production (in m€). Clearly, intensity drops significantly in 2024, consistent with the sharp reduction in consumption and the substantial linearity of revenues:

	2024	2023	%
<b>E3-4   29</b>	Intensità idrica (mc / M€ di ricavi netti)	0,009	0,020

## E5

## RESOURCE USE AND CIRCULAR ECONOMY

### Assessment of impacts, risks and opportunities related to the use of resources and the circular economy (E5-IRO1)

Below are the impacts and risks that emerged during the materiality analysis, regarding the use of resources:

	Impatto (+/-) Rischio/Opp.	Attuale /Potenziale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
Utilizzo ed afflusso di risorse	La realizzazione dei prodotti (porte, bagni e cabine) e l'allestimento degli interni a bordo, comportano l'afflusso ed il trasporto di quantitativi importanti di materiali	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Deflussi di risorse	Analogamente alla fase dell'afflusso, anche il deflusso prevede la movimentazione di ingenti quantitativi di materiali	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Rifiuti	De Wave è direttamente responsabile della produzione di rifiuti, in forma di scarti di produzione e di imballaggi, derivanti soprattutto dalle attività dei propri stabilimenti produttivi e dalle attività di allestimento interno delle navi.	<span style="color: orange;">-</span>	Attuale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	
Utilizzo ed afflusso di risorse	De Wave, a seguito dell'introduzione di normative che limitano o vietano l'estrazione e l'utilizzo di risorse fossili, rischia di subire la sopravvenuta irreperibilità di risorse e materiali derivati del petrolio (es. carburanti, vernici, prodotti plastici, ecc...)	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>				<span style="color: green;">✓</span>
"	Data la scarsità di alcune risorse di cui il gruppo si rifornisce (es legni pregiati), esiste il rischio subire la sopravvenuta irreperibilità delle stesse con conseguente rallentamento dei lavori per le commesse o l'aumento dei costi per la ricerca di prodotti alternativi.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>				<span style="color: green;">✓</span>
"	Tramite il riutilizzo del materiale di scarto, De Wave può rendere maggiormente efficiente l'uso delle risorse a disposizione, diminuendo i costi operativi di approvvigionamento	<span style="color: green;">O</span>	Potenziale		<span style="color: green;">✓</span>		<span style="color: green;">✓</span>	
Rifiuti	A causa della non corretta gestione e raccolta dei rifiuti generati durante le proprie attività di allestimento, De Wave rischia di ricevere sanzioni da parte dei cantieri presso cui opera.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		

The analysis was essentially based on the analysis of the goods and services purchased, which is strongly representative of the flow of incoming materials, and on the volumes and nature of the waste, which are significant instead of the outgoing flows. No consultations with the communities concerned were necessary

### Policies and actions related to resource use and the circular economy (E5-1, 2)

To date, no particular policies have been formulated aimed at the procurement of sustainable resources and the progressive abandonment of virgin resources, but the focus has been on the implementation of some specific actions.

In fact, at the beginning of 2024 De Wave launched a program to recover and recycle the rock wool waste produced in the Monfalcone plant. During 2024, 41 tons of rock wool were sent for recycling, and it is estimated that in 2025 the figure will rise to 60 tons.

In the near future, it is planned to draw up policies that will serve as a framework within which specific actions can be studied.

### Objectives related to the use of resources and the circular economy (E5-3)

De Wave has not yet formulated specific objectives in terms of circular economy (waste reduction, use of recycled materials, circular design of products, reduction of the use of raw materials, ...).

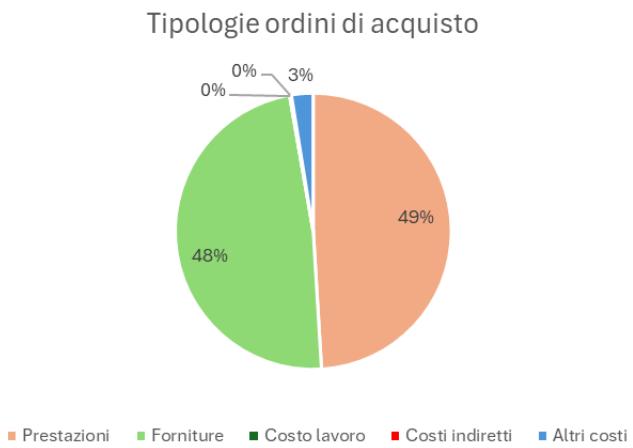
However, every year it accurately detects the quantities and types of waste disposed of or recycled by all the companies in the group, and in this way it maintains constant monitoring of these flows, detecting any increases in total quantities or hazardous waste, thus putting itself in a position to intervene, where necessary.

With specific reference to the issue of waste, the goal for 2025 is to join the new waste traceability information system, i.e. the National Electronic Register on Waste Traceability (RENTRI).

### Inbound Resource Flows (E5-4)

The analysis of the types of incoming materials was carried out by analyzing all the purchase orders of the most significant companies in this respect, namely De Wave, Tecnavi, Wingeco and Mobil Line, which together represent more than 96% of the group's production value.

Overall, these four companies have developed orders for a value of €187.7 million, broken down as shown in the graph opposite:

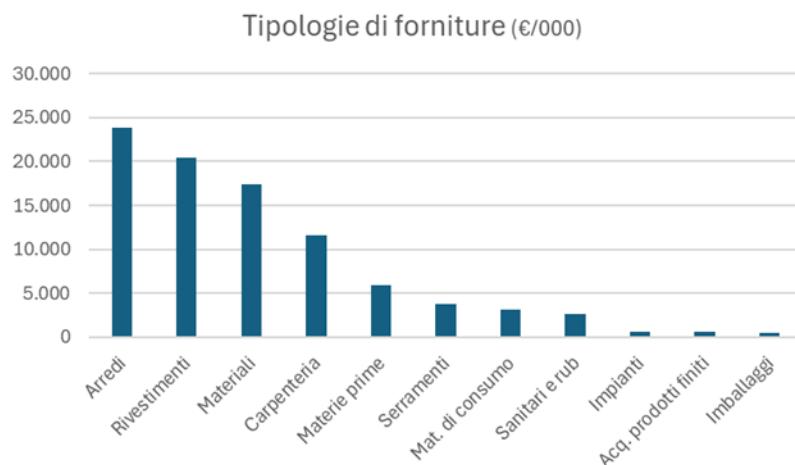


As you can see, the two main categories are made up of:

- "Supplies" (48%): materials, components, equipment, consumables, ...
- "Services" (49%): largely consisting of transport and assembly services on board

The analysis is based on the purchase values expressed or converted into euros. In fact, there are no homogeneous measurements relating to the total total weight of products and materials, nor to the percentage of biological materials contained in them.

Analyzing the category of supplies in more detail, it is possible to have a clearer representation of the purchase categories:



As you can see, most of it consists of furnishings and coverings, followed by materials and carpentry. It follows that the main materials entering the group's production cycle consist of; steel and other metals, wood and its derivatives, glass.

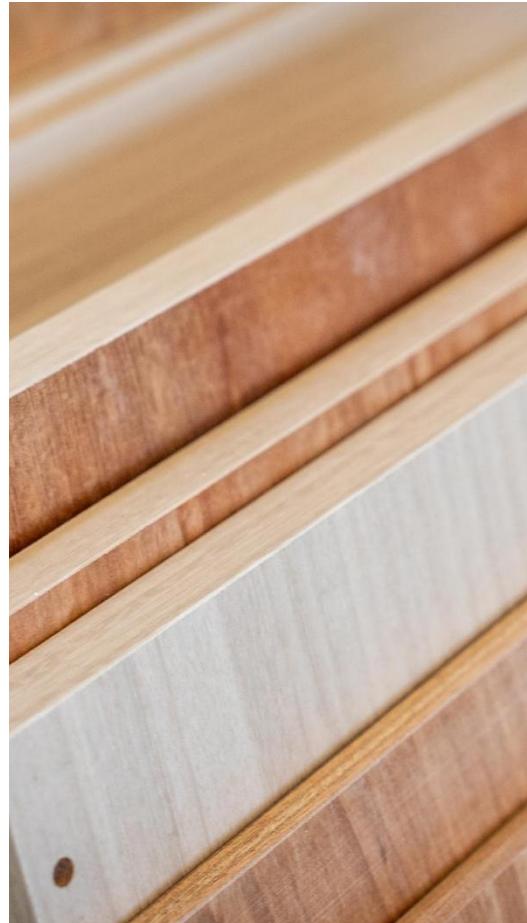
### (E5-5)

Proper waste disposal and management are fundamental aspects for the Group, both from an environmental and regulatory point of view. The criteria for the management of processing residues and waste disposal are implemented within the Management System (SG) through specific procedures, through which the aim is to reduce the amount of waste produced and to implement recycling and reuse practices of materials, in order to minimize environmental impact and promote sustainability

The Group's activities involve the production of waste from activities on site or on board ships (such as rock wool / glass wool waste, metal waste, damaged components, various packaging, some of which are contaminated by hazardous products), as well as from office activities (such as toner, paper and cardboard, civil waste, stationery products, exhausted batteries, etc.).

The management of waste in the shipyard or on board the ship, by contract, is the responsibility of the customer, who manages the site as a whole. Therefore, it can be said that waste is managed in compliance with the relevant regulations, namely:

- Analyzed, when necessary, for secure identification
- Handled and stored with care, at the place of production, until it is ready for disposal or recovery



- Stored in special containers, so as not to constitute a danger, and noted in special registers, as required by current regulations
- Registered via forms and loading and unloading registers
- Disposed of or recovered using authorized operators

The group's main activity is the construction of the interior rooms and systems of cruise ships and yachts. In a nutshell, the activity can be divided into the following business lines:

- **Cabins:** design, production and fitting out of the cabins on board (steel, rock wool, furniture, electrical equipment)
- **Bathrooms:** design, production and fitting out of the on-board bathrooms (steel, rock wool, fiberglass, marble cladding, ceramics, metal taps)
- **Public areas:** design and fitting out of public areas of ships, such as swimming pools, saunas, restaurant rooms, terraces, stairs, ... (in this case the materials range from wood, metals, glass, fiberglass, plastics, ...)
- **Catering:** design and construction of on-board kitchens: (steel, kitchen appliances)
- **Yacht:** design and construction of the interior: (wood)
- **Glazing and glass doors:** assembly and installation of glazing, balustrades, windows and curtain walls (glass, steel)
- **Systems:** assembly and installation of refrigeration and air conditioning, heating and fire prevention systems (metal pipes, insulating material, machinery such as boilers, heat exchangers, ...)

Given the extraordinary variety of environments created, the products and materials used, and also the type of use to which they are subjected, it is not possible to establish universal parameters of durability, repairability and the possibility of recycling or reuse. In general, the life cycle of the environments and systems built is of the order of years, but varies greatly due to many factors, including, for example:

- The same room (e.g. a cabin) can include different objects that have a totally different useful life, e.g. a mattress, a desk (<6 years) or a ceiling (>15 years)
- The same type of environment can be subject to completely different wear and tear depending on the ships on which it is used (and therefore the number of passengers transported in a given period of time)
- Products installed on high-end ships are often subjected to more frequent replacement by the shipping companies themselves.
- In other cases, the renovation of an area may be due to stylistic requirements dictated by the owner, regardless of the attributes of durability or repairability intrinsic to the product itself.

A more precise representation of the materials is provided in paragraph E5-4

Tons of waste produced by the group companies over the years:

The largest quantities of waste are produced (ton)	2022	2023	2024	24 vs 23
at the production sites in De Wave (cabins and bathrooms), De Wave Polska (bathrooms) and Inoxking (steel doors and catering).	De Wave	682,2	584,1	452,6
	Precetti	28,9	5,9	12,1
	DEW Polska	523,4	412,1	362,8
	PM 4.0	44,1	28,2	41,8
	Palamar	47,2	45,7	40,3
	Tecnavi	9,9	7,4	6,3
	Wingeco	28,9	31,3	52,5
	Inoxking			121,3
	<b>Totale</b>	<b>1.364,7</b>	<b>1.114,7</b>	<b>1.089,8</b>
				<b>-2,2%</b>

The 105% increase in Precetti is linked to fluctuations in production volumes, determined by the progress of projects: 2024 saw a strong recovery in orders, which therefore led to a proportional increase in waste produced.

E5-5   37	(ton)	Pericolosi	Non pericolosi	Totale
Preparazione per il riutilizzo	0,0	2,4	2,4	
Riciclo	0,0	208,1	208,1	
Altre operazioni di recupero	4,4	123,8	128,2	
<b>Recupero</b>	<b>4,4</b>	<b>334,4</b>	<b>338,8</b>	
Incenerimento	28,1	2,4	30,5	
Smaltimento in discarica	16,4	442,7	459,0	
Altre operazioni di smaltimento	1,0	266,4	267,4	
<b>Smaltimento</b>	<b>45,5</b>	<b>711,4</b>	<b>756,9</b>	
% rifiuti non riciclati	100,0%	80,1%	81,0%	

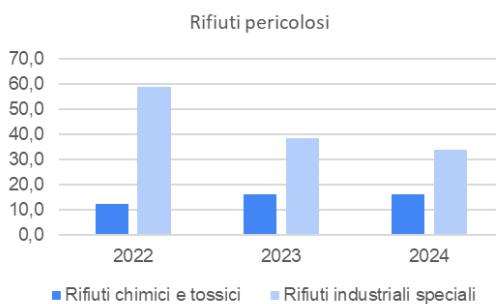
Below is a representation of the main types of waste produced:

E5-5   38	(ton)	2024
Rifiuti chimici vari	490,8	
Altro	301,8	
Metalli (misti)	208,9	
Carta e cartone	66,6	
Vetro	15,3	
Plastica	12,0	
Materiali contenenti amianto	0,3	
Legno	-	
<b>Totale</b>	<b>1.095,7</b>	

The "Other" component shown above consists of the following types of materials:

Cod CER	Descrizione	Peso %
170604	materiali isolanti	64,1%
150106	imballaggi in materiali misti	17,1%
150110*	imballaggi contenenti residui di sostanze pericolose o contaminati da tali sostanze	9,8%
200307	rifiuti ingombranti	6,3%
170603*	altri materiali isolanti contenenti o costituiti da sostanze pericolose	0,6%
150202*	assorbenti, materiali filtranti, stracci e indumenti protettivi, contaminati da sostanze pericolose	0,6%
	Altro	1,5%
		<b>100,0%</b>

(ton)	2022	2023	2024	24 vs 23
Non Pericolosi	1.293,1	1.059,9	924,5	-12,8%
Pericolosi	71,6	54,9	49,9	-9,0%
% Non Pericolosi	94,8%	95,1%	94,9%	
% Pericolosi	5,2%	4,9%	5,1%	



Due to the nature of the activities, the group does not generate radioactive waste.

The data comes from the MUD declarations of each company, and therefore from direct measurements.

The types of treatment are taken from the Disposal/Recycling codes, following the criterion:

- Disposal:
  - Incineration: D10, D11
  - landfill: D1, D5, D12
  - Other disposal operations: D2, D3, D4, D6, D7, D8, D9, D13, D14, D15
- Retrieval:
  - Preparation for reuse: R12
  - Recycling: R3, R4, R5, R7, R8
  - Other recovery operations: R1, R2, R6, R9, R10, R11, R13

# SOCIAL INFORMATION

## **S1** OWN WORKFORCE

### Stakeholder interests and views (S1-SBM2)

Each company in the group applies the National Collective Bargaining Agreement, a document that guarantees and defines the methods of expression of freedom of trade union association, the system of trade union relations and the right to national and company collective bargaining on behalf of the categories of workers in the defence of their interests, in the promotion of living standards in all contexts that require assessments and balances between the various social and social components. defining the methods and development of the participatory model of workers.

The group applies the information and consultation models within the trade unions, providing information on the company's performance, the targeted initiatives carried out, the implementation of projects aimed at protecting and improving the internal and external environment, and the initiatives relating to training policies linked to the promotion of collaborative mutual learning paths with the aim of to seek and promote a system of relationships that always responds to the new needs of workers.

In addition, the group promotes periodic Info Sessions aimed at publicizing and sharing with the entire corporate population business strategies, management models, initiatives aimed at promoting the consolidation and improvement of the company's value pillars.

### Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S1-SBM3)

Our workforce, which is the core of our business, is impacted by business activity as outlined in the IRO analysis.



In working conditions, the issues of secure employment, adequate wages, working hours closely linked to the balance between private and professional life are issues of attention and improvement, as well as the issue of health and safety.

Fair treatment and equal opportunities, in terms of gender equality and equal pay for work of equal value, training and skills development are all elements of observation and action.

The Group is committed to the personal and professional growth of employees, as well as creating an inclusive culture where each individual feels valued and supported. Career opportunities are offered to groups without distinction of gender or age.

The application of the National Collective Bargaining Agreement guarantees and regulates the functioning of the system of trade union relations and workers' representation, favouring maximum employee involvement. The duration of each National Collective Bargaining Agreement is on average about three years, the negotiation phase for renewal therefore determines risks of conflict between the formal institutions representing employers and workers related to the negotiation activities for the renewal. In particular, however, with moderate frequency, there may be risks of proclamation of strikes and/or suspension of overtime work activities with repercussions on the company's production process usually, however, for reduced periods and in general medium-short periods.

The same level of risk regarding the proclamation of strikes and/or suspension of overtime activities can be found in bargaining at company level on matters delegated by the National Collective Bargaining Agreement. Even for this level of bargaining, the impact is still attributable to repercussions on the company's production process, usually for short periods and in general medium-short periods.

		Impatto (+/-) Rischio/Opp. /Potenziale	Attuale	Posizione nella catena del valore		Orizzonte temporale		
				A monte	Operazioni proprie	Avalle	Breve termine	Medio termine
<b>Orario di lavoro</b>	Le attività, soprattutto presso gli stabilimenti produttivi e cantieri, rischiano di sottoporre i dipendenti ad orari e ritmi di lavoro elevati.		Attuale					
	De Wave, a causa degli orari di lavoro prolungati ed alto ritmo che coinvolgono i propri dipendenti operativi (in stabilimenti produttivi e cantieri in particolare), rischia di subire un alto tasso di turnover e, di conseguenza, costi più alti di selezione e formazione di nuovo personale.		Potenziale					
<b>Salute e sicurezza</b>	Le attività, soprattutto presso gli stabilimenti produttivi e cantieri, possono esporre i dipendenti ad alti rischi di infortuni ed incidenti.		Attuale					
	De Wave, a causa della mancata applicazione delle norme in materia di salute e sicurezza dei propri dipendenti, rischia di subire danni reputazionali e sanzioni a seguito di potenziali incidenti o infortuni sul lavoro.		Potenziale					
<b>Parità di genere e parità di trattamento</b>	De Wave, a seguito dell'introduzione di nuove normative in ambito di salute e sicurezza, subisce un aumento dei costi connesso alla necessità di adeguamento alle richieste normative		Potenziale					
	La mancanza di procedure e policy interne rischia di non assicurare parità di trattamento economico in base al genere o altri fattori.		Attuale					
<b>Occupazione sicura</b>	De Wave, non garantendo una parità salariale e di trattamento al di là del genere, rischia di subire danni reputazionali, oltre ad un peggioramento dell'employer branding.		Potenziale					
	De Wave garantisce un'occupazione sicura alta maggior parte dei propri dipendenti attraverso la sottoscrizione di proposte contrattuali a tempo indeterminato.		Attuale					
<b>Salari adeguati</b>	De Wave assicura ai propri dipendenti salari adeguati, attraverso l'offerta di stipendi competitivi e l'integrazione degli stessi con premi di risultato annuali.		Attuale					
<b>Equilibrio fra vita privata e professionale</b>	De Wave, attraverso l'introduzione del contratto integrativo di 2 livello, assicura ai propri dipendenti nelle sedi italiane maggiore flessibilità lavorativa e maggiore equilibrio fra vita professionale e privata.		Attuale					
<b>Formazione e sviluppo delle competenze</b>	De Wave prevede la formazione continua e mirata dei propri dipendenti, con corsi ed iniziative aggiuntive rispetto a ciò che è stabilito per legge (es. Leadership Academy, De Wave Academy)		Attuale					
<b>Impatti legati al territorio</b>	De Wave, grazie all'elevato bisogno di personale per lo svolgimento delle proprie attività, è responsabile della creazione di numerosi posti di lavoro con conseguente impatto positivo dal punto di vista occupazionale nei confronti delle comunità dei luoghi in cui opera.		Attuale					
<b>Impatti legati al territorio</b>	De Wave contribuisce indirettamente allo sviluppo del turismo crocieristico, con conseguente impatto positivo sull'economia delle località visitate dalle navi da crociera.		Attuale					
<b>Impatti legati alla sicurezza</b>	De Wave, tramite l'erogazione dei propri servizi per conto di Mariotti e Fincantieri, contribuisce all'efficienza della flotta della Marina Militare, la quale ha presidio della difesa dello Stato e delle nazioni alleate.		Attuale					

## Own Labour Policies (S1-1)

Although the principle of respect for human rights in the workplace and everything that derives from it is implicitly taken up in various policies, from the Code of Ethics to the Anti-retaliation policy, to the supplier

selection process, it is not made explicit in plain text. De Wave is committed to updating its policies during 2025 by clearly explaining this principle and references to internationally defined instruments, such as the United Nations Guiding Principles.

The companies of the group scrupulously apply the provisions of the National Collective Agreements of the category, guaranteeing, through the specific rules and provisions contained therein, respect for human rights, labour rights, the elimination of all forms of forced labour, the elimination of child labour and in general the elimination of any form of discrimination in the field of labour.

Some of the main companies of the group (De Wave, Tecnavi and Wingeco) have already obtained the ISO 45001 certification issued by Accredia and their employees and external workers can therefore be considered covered by the health and safety management system. Specifically, therefore, the percentages of workers covered are as follows:

S1-1   23	Dipendenti	Non Dipendenti
% lavoratori coperti da sistema gestione sicurezza	65,8%	83,3%

During 2025, the group intends to extend the safety management system to other companies, with the aim of reaching a coverage of 73%

The National Collective Agreements applied define the management methods and establish the functioning of specific commissions and observatories composed at national and territorial level, composed of representatives of companies and workers, set up for the purpose of carrying out study, research, and promotion of equal opportunities, professional training, and the integration of migrant workers.

At company level, during the recruitment phase, the "Company Code of Ethics" is distributed, a document aimed at confirming the fundamental principles and guidelines of conduct that all workers must respect, such as honesty, moral integrity, fairness, transparency and objectivity in the pursuit of corporate targets.

During the calendar year 2025, training sessions will be organized on the topic of Diversity & Inclusion. Initiative aimed at raising awareness among division/function/area managers of the enhancement of the characteristics of each individual within work contexts and consequently aimed at preventing and countering any form of prejudice and promoting gender inclusion and overcoming unconscious stereotypes

Since January 2025, the De Wave group has also joined the Elis consortium with active participation in the "Include to Grow" project, an alliance between companies that intend to carry out inclusion projects, such as promoting an inclusive context that values each individual, encouraging the adoption of sustainable

practices within the supply chains (social enterprises, social cooperatives), enhancing the skills and abilities of people "bearers of resources": mothers, immigrants and refugees, people in conflict with the law, people over 55, people with disabilities.

### Involvement of workers and their representatives (S1-2)

In principle and in general, the group encourages and promotes actions aimed at promoting the involvement of its workforce, through training activities aimed at promoting an open and participatory communication culture, with particular focus on issues related to the establishment of a collaborative and positive relationship between division/function/area managers and direct collaborators, emotional intelligence, feedback, trust and change management.

The group has also invested in corporate spaces with layouts and areas aimed at encouraging socialization, networking and attention to the person by promoting interpersonal relationships.

The National Collective Agreements of the category applied define the system of trade union relations with the intention of consolidating and developing the choice of the participatory method, attributing the management of labour relations to the national level as an essential role in the prevention of potential conflicts.

The structure of collective bargaining has two levels, the National Collective Agreement has the function of guaranteeing the certainty of common economic and regulatory treatments for all workers in the sector wherever employed at national level and company and individual bargaining aimed at improving the working conditions of the individual person aimed at promoting a closer and more direct action of improvement and participation of the worker.

Agreements for the improvement of working conditions and participation through the negotiation and signing of second-level company agreements for the establishment of collective variable bonus systems linked to the achievement of company performance objectives are promoted and in force at company level, on the initiative of workers' representatives as provided for by the system of trade union relations. the establishment of special permits to promote work-life balance, the regulation for the use of smart working.

In order to directly involve the workforce in the achievement of company results, promote increases in productivity, quality and profitability and the consequent improvement of company competitiveness, the Group encourages and signs agreements with the workers' representative bodies for the potential recognition of a performance bonus.



In order to acquire the elements of common knowledge for the definition of the objectives covered by the performance bonus and company bargaining, the Group and the workers' representative bodies examine in advance in a special meeting the production and employment conditions and the related prospects as well as the essential conditions of profitability, as well as the amounts are defined, the objectives and mechanisms useful for the quantitative determination related to the performance bonus.

Once the structure of the performance bonus for the relevant period has been defined and the specific agreement that regulates it has been signed, as well as publicized to the workers, the Group and the workers' representative bodies plan periodic meetings to monitor the reference parameters in order to raise awareness of the trend towards their progress and to assess any necessary improvement actions.

The amounts payable are calculated with reference to the results achieved and then communicated to the workforce

#### Processes for remedying negative impacts and communication channels with own workers (S1-3)

The De Wave group, in order to improve the current reporting systems in compliance with the provisions of the law and with a view to ensuring fairness and transparency in the conduct of its business, has set up an IT "Whistleblowing" platform to carry out any reports of legal offences. The goal and commitment are to guarantee decent working conditions and an environment free from forms of discrimination or abuse, establishing relationships based on principles of fairness, equality, non-discrimination, attention and respect for the dignity of the person.

To this end, it has also prepared a special anti-retaliation policy, published on the company website.

The De Wave Group is committed to supporting a corporate culture where legal and ethical issues can be reported, without fear of retaliation. De Wave provides its employees and other interested parties (such as customers, suppliers, consultants, ...) with multiple channels to facilitate the reporting/reporting of such situations and prohibits any form of retaliation against employees and other interested parties who, in the name of honesty and in good faith, have highlighted these problems

#### Interventions on impacts, approaches for risk management and the pursuit of relevant opportunities in relation to the own workforce (S1-4)

Our policies and processes are the basis for actions to prevent potential negative impacts and to promote positive outcomes.

The goal is to formalize a system of periodic evaluations, annual surveys thanks to the intervention and action of human resources, in order to contribute to a supportive and inclusive work environment.

In addition, our commitment to training and skills development has a positive impact on our workforce, empowering employees and ensuring they have the tools they need to succeed and thrive. All actions implemented in 2024 are ongoing and are subject to continuous evaluation.

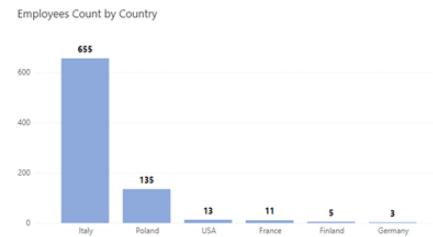
## Objectives related to the management of negative impacts, the enhancement of positive impacts and the management of risks and opportunities (S1-5)

De Wave's commitment and attention to its employees is constant; however, the fact that the IROs have only been formally made explicit at the end of 2024 means that at the moment no targets have yet been set in relation to each impact. The intent is to address this aspect during 2025.

## Characteristics of the company's employees (S1-6)

- As of 31/12/2024, the group had a workforce of **822** employees, in line with the average for the year (817 employees) and slightly down compared to the same period of the previous year (838 employees)
- The data below refer only to employees (and not to the entire own workforce)
- To facilitate a summary representation of the data, all the tables show the details of men (M) and women (F), as none of the companies in the group has registered employees or collaborators belonging to the "Other" or "Not specified" genders. Should such categories be included in the future among the interested parties, due exposure will be given in the reports.

S1-6   50.a	M	F	TOT	M %	F %	TOT %
Italy	491	164	655	59,7%	20,0%	<b>79,7%</b>
Poland	109	26	135	13,3%	3,2%	<b>16,4%</b>
USA	8	5	13	1,0%	0,6%	<b>1,6%</b>
France	9	2	11	1,1%	0,2%	<b>1,3%</b>
Finland	5		5	0,6%	0,0%	<b>0,6%</b>
Germany	3		3	0,4%	0,0%	<b>0,4%</b>
	<b>625</b>	<b>197</b>	<b>822</b>	<b>76,0%</b>	<b>24,0%</b>	<b>100,0%</b>



- The majority of the companies in the group and their offices are located in Italy (about 80% of the workforce), followed by Poland, where the Lipno bathroom production plant is located (16.4%), followed by the other countries, which host permanent establishments of Italian companies (France, Finland and Germany) or group companies (USA).

S1-6   50.b	M	F	TOT	M %	F %	TOT %
T. Indeterminato	579	181	760	70,4%	22,0%	<b>92,5%</b>
T. Determinato	46	16	62	5,6%	1,9%	<b>7,5%</b>
Orario variabile	-	-	-	0,0%	0,0%	<b>0,0%</b>
	<b>625</b>	<b>197</b>	<b>822</b>	<b>76,0%</b>	<b>24,0%</b>	<b>100,0%</b>

- During 2024, the employees who left the group's companies were: 262, a figure that corresponds to a turnover of 32.3%. The turnover rate is calculated as the ratio between the sum of all employees who left in the period and the average of employees in force in the same period
- The data are expressed in heads and collected at 31/12. Where significant, average values for the year were also provided, in order to represent any fluctuations from the average

Given the nature of the activities, only 3.2% of the group's employees have a part-time contract, mainly concentrated among the female population:

S1-6   52	M	F	TOT	M %	F %	TOT
Full Time	620	176	796	75,4%	21,4%	96,8%
Part time	5	21	26	0,6%	2,6%	3,2%
	<b>625</b>	<b>197</b>	<b>822</b>	76,0%	24,0%	100,0%

The contractual institution of part-time work is little used considering the tools of flexible working hours in force in the group which establish the possibility of being able, within certain limits, to start and end work in time slots more congenial to personal commitments. In addition, compatibly with the specific task, the institution of smart working is present and regulated as a tool to improve the work-life balance of the individual person.

### Characteristics of self-employed persons in the own workforce (S1-7)

In accordance with the standards, the De Wave Group considers **non-employees** in its workforce:

- CoCoCo contract staff (including administrators)
- Trainees
- persons who have contracts with the company for the supply of labour ('self-employed persons')
- workers made available by companies that mainly carry out "search, selection and supply of personnel", hereinafter referred to as "temporary workers".
- As of 31/12/2024, the total number of non-employees is 48 workers, broken down as follows:
  - o Temporary workers: 32
  - o Internships: 7
  - o Ind temporary collaborations: 7 (includes company directors)
  - o Fixed-term collaborations: 2

S1-7   55.a	M	F	TOT	M %	F %	TOT %
Italy	36	10	46	75,0%	20,8%	95,8%
Poland	1	1	2	2,1%	2,1%	4,2%
	<b>37</b>	<b>11</b>	<b>48</b>	<b>77,1%</b>	<b>22,9%</b>	<b>100,0%</b>

S1-7   55.a	M	F	TOT	M %	F %	TOT %
T. Indeterminato	7	0	7	14,6%	0,0%	14,6%
T. Determinato	3	6	9	6,3%	12,5%	18,8%
Somministrati	27	5	32	56,3%	10,4%	66,7%
	<b>37</b>	<b>11</b>	<b>48</b>	<b>77,1%</b>	<b>22,9%</b>	<b>100,0%</b>

S1-7   55.a	M	F	TOT	M %	F %	TOT %
Full Time	37	9	46	77,1%	18,8%	95,8%
Part time	0	2	2	0,0%	4,2%	4,2%
	<b>37</b>	<b>11</b>	<b>48</b>	<b>77,1%</b>	<b>22,9%</b>	<b>100,0%</b>

The values in the previous point represent the number of heads. The figure does not differ significantly from the average for the year, equal to 51 units.

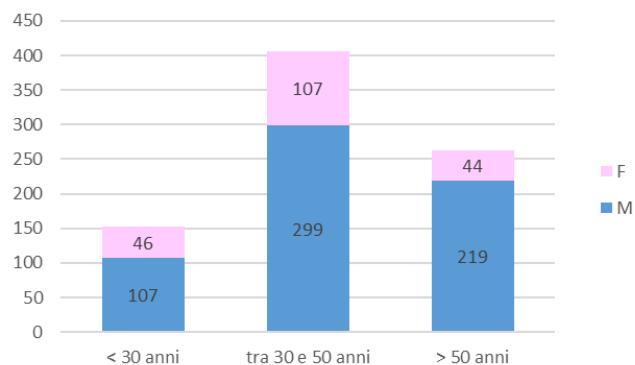
### Diversity metrics (S1-9)

Distribuzione per fascia di età dei dirigenti

S1-9   66.a	M	F	TOT	M %	F %	TOT %
< 30 anni	3	0	3	11,1%	0,0%	11,1%
tra 30 e 50 anni	7	1	8	25,9%	3,7%	29,6%
> 50 anni	11	5	16	40,7%	18,5%	59,3%
	<b>21</b>	<b>6</b>	<b>27</b>	<b>77,8%</b>	<b>22,2%</b>	<b>100,0%</b>

Looking instead at the total number of employees, the group has a relatively young population: almost half of the employees are concentrated in the 30-50 age group, while 18.6% are under 30 years old:

S1-9   66.b	M	F	TOT	M %	F %	TOT %
< 30 anni	107	46	153	13,0%	5,6%	18,6%
tra 30 e 50 anni	299	107	406	36,4%	13,0%	49,4%
> 50 anni	219	44	263	26,6%	5,4%	32,0%
	<b>625</b>	<b>197</b>	<b>822</b>	<b>76,0%</b>	<b>24,0%</b>	<b>100,0%</b>



### Adjusted wages (S1-10)

- The group complies, in accordance with the provisions of the national law, with the tables of contractual minimums adapted to the final inflationary dynamics.
- The increases in the minimum wage scales are established and updated at national level on the basis of the National Collective Labour Agreements applied.

### Social protection (S1-11)

All employees are covered by social protection, through public programs or benefits offered by the company, against loss of income due to important life events such as illness, unemployment, accident at work and acquired disability, parental leave and retirement.

## People with disabilities (S1-12)

The Group complies with the regulations on targeted placement established by Law 68/99 and promotes the signing of agreements with the public offices in charge aimed at promoting the employment of personnel belonging to protected categories

S1-12   79	M	F	TOT	M %	F %
Dipendenti con disabilità	14	12	26	53,8%	46,2%

## Training and Skills Development Metrics (S1-13)

Starting from the calendar year 2026, an individual performance review process will be promoted and consolidated for the group's workers, aimed at ensuring alignment between manager and collaborator on the main objectives to be paid attention to during the relevant calendar year and accurately analyzing the presence of any training gaps relating to the knowledge of the technical and behavioral/attitudinal skills assigned to each role.

By the end of the 2025 calendar year, the system will be presented to the company population for implementation and use.

In the meantime, informally, an individual performance review process is promoted at group level to facilitate the analysis of the professional/personal performance of each worker and improve the relationship of trust between manager and collaborator. The HR function collects from division/function/area managers any requests and reports about the need to support and/or raise awareness among workers who show difficulties in the performance of assigned work tasks or requests for remuneration and/or individual bonus systems such as requests for changes in contractual category, superminimum increases, one-off bonuses, assignment of MBO.

The following table shows the total number of hours of training provided to employees:

S1-13   83.b		N ore per dipendente			
Ore di formazione	Ore	N dipendenti	2024	2023	2022
DE WAVE SRL	2.717	409	6,6	7,2	10,1
DE WAVE POLSKA	304	135	2,3	10,2	0,2
PRECETTI SRL	288	0	0,0	8,5	2,1
PRECETTI INC	0	13	0,0	0,0	0,0
PM4	134	28	4,8	4,3	3,0
PM5	0	1	0,0	0,0	0,0
MOBIL LINE	694	33	21,0	6,9	7,7
TECNAVI	935	66	14,2	7,1	7,2
Wingeco	409	66	6,2	21,0 na	
Inoxking	0	71	0,0		
<b>Gruppo</b>	<b>5.481</b>	<b>822</b>	<b>6,7</b>	<b>7,5</b>	<b>5,8</b>

The breakdown by level and gender for 2024 is only available for the companies De Wave, Tecnavi, Wingeco and Mobil Line, which in any case together make up 70% of the group's population. The goal is to be able to represent the gender breakdown on all group companies from 2025:

S1-13   83.b	Uomini			Donne			Totale		
	N	ore	h/dip	N	ore	h/dip	N	ore	h/dip
Dipendenti	419	3.091	7,4	155	1.664	10,7	574	4.755	8,3
Non Dipendenti	31	161	5,2	9	63	6,9	40	223	5,6
	<b>450</b>	<b>3.251</b>	<b>7,2</b>	<b>164</b>	<b>1.727</b>	<b>10,5</b>	<b>614</b>	<b>4.978</b>	<b>8,1</b>

In an increasingly competitive market with the related need for a workforce with specific skills and adapted to the changing challenges of the market, the Group has decided from a strategic point of view to put in place a preparatory action to respond in the medium and long term to the requests for new personnel from the various company functions.

With reference to the above, the Group, through sponsorship of the internal HR function and the members of the Management Board, in collaboration and partnership with the Italian Academy of the Merchant Marine in Genoa, has promoted the establishment of an internal training Academy by promoting the training course for the achievement of the qualification of "Ship Manager & Superintendent".

A training course in which students, who have joined the project by registering for a specific call at national level, will have the opportunity to gain transversal technical and aptitude knowledge in the naval field.

The training course is aimed at offering students a professional path following the completion of the study plan, which lasts two years, with the Group's commitment to contract a number of participants of not less than 70% of those enrolled.

With reference to the above and during the course of the study plan, meeting events have been organized between HR representatives and Group department managers with students, which represent an important opportunity for discussion to tell and describe the peculiar characteristics of our sector and the strategies and dynamics of our Group.

The HR function maintains active contact between students and the internal organisational structure in order to ensure constant and lasting knowledge of the reference business, the changing changes that characterise it and facilitate the future entry of students into the Group.



## Health and Safety Metrics (S1-14)

With regard to workers covered by the Health and Safety Management System, see point S1-1 | 23

		2024	2023	Delta %
<b>Num Infortuni (non mortali)</b>	Dipendenti	21		0,0%
	Non Dipendenti	2		0,0%
	<b>Totale</b>	<b>23</b>	<b>21</b>	<b>9,5%</b>
<b>Num Infortuni mortali</b>	Dipendenti	-		0,0%
	Non Dipendenti	-		0,0%
	Altri lavoratori	-		0,0%
<b>S1-14   88.b</b>	<b>Totale</b>	-	-	<b>0,0%</b>
<b>S1-14   88.c</b>	<b>Totale num infortuni</b>	23	21	9,5%
	<b>Tasso di infortunio</b>	16,46	14,59	12,9%
<b>S1-14   88.d</b>	<b>Num malattie connesse</b>	Dipendenti	65	0,0%
<b>S1-14   88.e</b>	<b>Num giornate perse</b>	Dipendenti	638	922
	<b>Num ore lavorate</b>	Dipendenti	1.397.073	1.439.658
				-3,0%

## Work-life balance metrics (S1-15)

During 2025, 140 employees were entitled to family leave, and of these 47 took it:

S1-15   93	M	F	TOT	M	F	TOT	
% dipendenti con diritto a congedi familiari	97	43	<b>140</b>	11,8%	5,2%	17,0%	<i>% calcolata sul totale dipendenti di gruppo</i>
% dipendenti che ne hanno usufruito	27	20	<b>47</b>	19,3%	14,3%	33,6%	<i>% calcolata sul totale degli aventi diritto</i>

Family leave, although provided for by current legislation, is used in a reduced way considering the flexibility tools present in the company that allow workers to take care of family members, satisfying emotional and relational needs.

## Compensation metrics (S1-16)

De Wave has set up a "Compensation & Benefits" Committee, which meets monthly in order to define compensation policies, evaluate the performance of top management figures and in general ensure fair and adequate remuneration for its employees.

The pay gap between the average salaries of male and female employees is represented in the following tables, by country and by grade:

S1-16   97.a	2024	S1-16   97.a	2024
Italy	5,92	Executive	40,34
USA	18,95	White collar	15,43
France	29,45	Blue collar	34,99
Poland	7,11	Apprentices	1,70
<b>Total</b>	<b>4,34</b>	<b>Total</b>	<b>4,34</b>

The ratio is calculated according to the formula:

$$\frac{(\text{Average gross hourly earnings of male employees} - \text{average gross hourly earnings of female employees})}{\text{Average gross hourly earnings of male employees}} \times 100$$

The figure refers only to employees. In Precetti Ltd (USA) the ratio is significantly higher than the average of other countries as the CEO has an employee relationship and not a Director contract, as is the case in other companies.

The following tables represent the ratio of the total annual remuneration of the person earning the highest salary to the median total annual remuneration of all employees (excluding the person with the highest salary). In order to offer a more accurate representation, the data is broken down by country and by classification, and in both cases it is then broken down by gender:

S1-16   97.b	M	F	All	S1-16   97.b	M	F	All
Italy	9,1	3,0	<b>9,0</b>	Executive	3,6	1,3	<b>4,7</b>
USA	10,2	1,5	<b>8,1</b>	White collar	2,2	2,4	<b>2,4</b>
Finland	1,1		<b>1,1</b>	Blue collar	2,3	4,1	<b>2,4</b>
Germany	1,1		<b>1,1</b>	Apprenticeship	1,1	1,1	<b>1,1</b>
France	1,6	1,3	<b>1,6</b>	<b>Total</b>	<b>13,3</b>	<b>3,1</b>	<b>13,0</b>
Poland	6,3	1,9	<b>6,4</b>				
<b>Total</b>	<b>13,3</b>	<b>3,1</b>	<b>13,0</b>				

The ratio is calculated according to the formula:

*Total annual remuneration for the person with the highest salary in the company*

*Median annual total compensation of employees (excluding the person with the highest salary)*

## S2

## WORKERS IN THE VALUE CHAIN

### Interests and views of stakeholders (S2-SBM2)

The main listening channel remains the Whistleblowing portal, which is also available to workers included in the value chain.

### Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S2 SBM3)

The workers in the value chain involved and stakeholders are all those involved in the activity with third-party producers and suppliers operating for the Group's activities.

The vast majority of De Wave's first upstream players in the value chain are:

- the companies that produce the goods installed in boron and the materials used in the production of bathrooms and cabins;
- the companies that supply the workers who transport and assemble the environments on board, and therefore: craftsmen, assemblers, welders, ...

All these subjects, whether internal or external, contribute to creating value for the group and at the same time the relationship that De Wave establishes with them can generate, for both parties, the positive and negative impacts identified between IROs.

The application of the National Collective Bargaining Agreement guarantees and regulates the functioning of the system of trade union relations and workers' representation, favoring maximum employee involvement. The duration of each National Collective Bargaining Agreement is on average about three years, the negotiation phase for renewal therefore determines risks of conflict between the formal institutions representing employers and workers related to the negotiation activities for the renewal. In particular, however, with moderate frequency, there may be risks of proclamation of strikes and/or suspension of overtime work activities with repercussions on the company's production process usually, however, for reduced periods and in general medium-short periods.

The same level of risk regarding the proclamation of strikes and/or suspension of overtime activities can be found in bargaining at company level on matters delegated by the National Collective Bargaining Agreement. Even for this level of bargaining, the impact is still attributable to repercussions on the company's production process, usually for short periods and in general medium-short periods.

The group, through the DMA double materiality analysis, has identified the impacts, risks and opportunities related to workers in the supply chain, highlighting the following elements.

	Impatto (+/-) Rischio/Opp. /Attuale Potenziale	Posizione nella catena del valore			Orizzonte temporale		
		A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
<b>Orario di lavoro</b>	Le imprese della catena del lavoro potrebbero non garantire ai propri dipendenti orari di lavoro dignitosi.	−	Potenziale	✓	✓	✓	
<b>Salari adeguati</b>	Le imprese della catena del lavoro potrebbero non garantire ai propri dipendenti salari adeguati e dignitosi.	−	Potenziale	✓	✓	✓	
"	De Wave, a causa dei salari non adeguati che possono essere previsti presso le aziende della catena del valore, rischia di subire disagi e ritardi negli approvvigionamenti a seguito di possibili scioperi, oltre a possibili danni reputazionali.	R	Potenziale	✓		✓	
<b>Salute e sicurezza</b>	Le imprese della catena del lavoro potrebbero non garantire il rispetto delle norme di salute e sicurezza, esponendo i dipendenti a rischi elevati.	R	Potenziale	✓		✓	
"	De Wave, a causa delle condizioni precarie di sicurezza a cui sono sottoposti alcuni lavoratori della catena di fornitura, rischia di subire ritardi nella consegna di materiali e risorse, a causa di stop produttivi dei fornitori, dovuti a scioperi o incidenti avvenuti all'interno della catena stessa.	R	Potenziale	✓		✓	
"	Le imprese della catena del lavoro potrebbero non garantire il rispetto delle norme di salute e sicurezza, esponendo i dipendenti a rischi elevati.	−	Potenziale	✓	✓	✓	
<b>Lavoro minorile</b>	Alcune organizzazioni della catena del valore, potrebbero fare ricorso a pratiche di lavoro minorile.	−	Potenziale	✓	✓	✓	
<b>Lavoro forzato</b>	Alcune organizzazioni della catena del valore, potrebbero fare ricorso a pratiche di lavoro forzato.	−	Potenziale	✓	✓	✓	

We believe that we must focus our attention on issues related to working conditions, respect for human rights, specifically health and safety, child labour and forced labour.

### Policies related to workers in the value chain (S2-1)

Although the group has not formally adopted a policy related to workers in the value chain, it promotes the development and attention to the mitigation of impacts, starting with the adoption of the Code of Ethics and compliance with current regulations.

Our vision of the value chain and the workers who are involved in it is to promote a growth path based on innovation, on sustainability where the values expressed in the group's Code of Ethics are values also shared by stakeholders.

The strategy we respect, in agreement and continuity with the most structured stakeholders and proponents of sustainability, aims to promote continuous improvement, where the culture of social development is promoted, which passes through the well-being of workers and local communities.

As expressed in the Code of Ethics, we ask our suppliers to fully comply with the laws and our guiding principles:

- Human Rights: dignity and equality for all, prohibition of child and forced labour, fair wages and work-life balance.
- Health and Safety: risk reduction, zero accidents and safety culture.
- Diversity and Inclusion: respect for inequalities, teamwork and people at the center.
- Respect for the environment

Although it operates largely with local suppliers, it is expected that, in the case of transactions with suppliers who are positioned in a long international supply chain and with subcontractors operating in countries with poor protection of human rights, De Wave will operate according to the OECD Guidelines and according to the application instructions provided by the Italian NCP – National Contact Point for the application of the OECD Guideline (based at the Ministry of Economic Development).

### Processes of worker involvement in the value chain (S2-2)

The group respects and promotes the rules that protect the rights of workers in the value chain. Currently, there are no mechanisms in place for listening directly, or through representatives, to workers in the value chain, other than those provided for and legitimized by the contracts signed with customers and suppliers, their employers.

The voice of workers is protected and supported by the signing of subcontracting contracts that provide for the joint liability of clients, contractors and subcontractors.

The group has adopted a whistleblowing management system, accessible through a dedicated IT platform and compliant with whistleblower protection regulations. This system allows affected communities and third parties to report any violations, supporting transparency and respect for rights.

### Remediation processes for negative impacts and communication channels (S2-3)

Beyond the provision of the Whistleblowing channel, there are currently no specific remediation processes.

Through the signing of subcontracting contracts, the aim is to increase the level of compliance with tax, social security, insurance and occupational safety obligations to which companies are required.

These are legal conditions that activate a bond of solidarity between the contracting authority and the contractor with respect to all taxing, social security and insurance bodies, limited to the work services used to perform the contract.

This rule of joint liability between contractor and subcontractor is general and without exception and prescribes cooperation between employers in order to implement measures to prevent and protect against risks at work, coordinate the measures to protect and prevent workers from risks.

According to art. 29, paragraph 2 of Legislative Decree no. 276/2003, in order to protect the worker employed under a contract (both works and services), established a bond of joint liability between the client, contractor and any subcontractors, within the limit of two years from the termination of the contract without quantitative limits, for the payment to workers of the wages and social security contributions due. Joint and several parties can be exempt from this liability only if they demonstrate that the workers' contribution and social security credits do not concern the work performed under the contract or subcontract. In this constraint of

In order to comply with these legislative provisions, checks and monitoring are carried out on compliance with the obligations of our subcontractors.

#### **Interventions on significant impacts and risk management for workers in the value chain (S2-4)**

The actions that can be implemented are many and involve a significant organizational investment.

The group is developing a process for assessing suppliers as an essential component of the Integrated Safety and Environment Management System, in addition to what has already been implemented in compliance with the quality certification procedures of accredited certification bodies.

The aim is to ensure that the services acquired meet the organisation's HSE requirements. The objectives of the process are:

- Assess the skills of suppliers in HSE matters and verify their suitability with respect to the mandatory requirements or requirements required and expected by the Group;
- Periodically evaluate the performance of suppliers with regard to HSE KPIs;
- Collaborate with suppliers to resolve any quality issues and continuously improve performance;
- Ensure traceability of compliance with mandatory and expected HSE requirements throughout the supply chain;

This process is indirectly transformed into attention to the safety and health of workers in the value chain.

#### **Objectives for the management of impacts, risks and opportunities (S2-5)**

The group has not yet adopted a specific policy and specific processes and interventions on IROs, as well as has not set targets for impact management.

### S3

## AFFECTED COMMUNITIES

### Interests and views of stakeholders (S3-SBM2)

The group, which is growing strongly and continuously, is aware of the need and opportunity to play an increasingly active role in the territories in which it operates.

Communities' opinions can serve as a basis for devising and implementing more effective and responsible business strategies. At the moment, the company strategy provides for an assessment of these community interests, but it does not undergo guidance and has not identified specific monitoring.

### Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S3-SBM3)

From the double materiality analysis carried out, the IROs concerned are represented below:

	Impatto legati al territorio	Le navi da crociera, clienti dirette o indirette di De Wave, contribuiscono al peggioramento della qualità dell'aria delle città portuali e delle aree costiere.	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale	Posizione nella catena del valore			Orizzonte temporale		
					A monte	Operazioni proprie	Avalle	Breve termine	Medio termine	Lungo termine
	"	De Wave contribuisce indirettamente allo sviluppo del turismo crocieristico, con conseguente impatto negativo dovuto al sovraffollamento delle località in cui le navi fanno scalo.	-	Attuale			✓	✓	✓	
	"	De Wave, grazie all'elevato bisogno di personale per lo svolgimento delle proprie attività, è responsabile della creazione di numerosi posti di lavoro con conseguente impatto positivo dal punto di vista occupazionale nei confronti delle comunità dei luoghi in cui opera.	+	Attuale			✓		✓	
	"	De Wave contribuisce indirettamente allo sviluppo del turismo crocieristico, con conseguente impatto positivo sull'economia delle località visitate dalle navi da crociera.	+	Attuale			✓		✓	
	Impatti legati alla sicurezza	De Wave, tramite l'erogazione dei propri servizi contribuisce all'efficienza della flotta della Marina Militare, la quale ha presidio della difesa dello Stato e delle nazioni alleate.	+	Attuale			✓		✓	

De Wave is aware of the impact on the territory that also occurs through its customers, with whom we share the same values and strategies to reduce negative effects.

The customers themselves recognize and support communities made up of people, traditions, culture and economy. They support tourism that coincides with the revival of the communities' heritage, employment and local economies and that creates value for the entire ecosystem.

They declare themselves active in understanding the needs of the Communities, confronting themselves directly with the Institutions and with the Authorities and Organizations protagonists of the local ecosystems, to concretely contribute to identifying the best solutions.

The Code of Ethics and Professional Conduct that they sign vigorously confirms compliance with the law, environmental protection, protection of the safety, health and well-being of the places visited and their

inhabitants, promotes and supports respect for human rights, integrity in business management and the promotion of sustainability.

In terms of security impacts (i.e. in relation to the activities carried out for the Italian Navy), it should be noted that De Wave has started a collaboration aimed exclusively at the creation of technical lockers.

### Policies relating to affected communities (S3-1)

At the moment, a policy specifically dedicated to the communities concerned has not yet been formulated, but De Wave is available to collaborate and support any policies promoted by its customers.

### Affected community engagement processes on impacts (S3-2)

The group has not yet adopted a process to involve local communities, but implements and supports individual projects that create value.

We are committed to countering the problem of the mismatch between labour supply and demand by acting upstream, i.e. on skills, to guide and train students, the unemployed and unemployed to the most critical and sought-after professions in the sectors in which we operate.

### Processes for remedying negative impacts and channels for affected communities to express concerns (S3-3)

With regard to the processes to remedy the negative impacts, the group has not outlined a defined strategy, but this can be reflected in the modernization and optimization of fleets and indirectly in the support and sharing of customers' efforts and objectives.

With a view to innovation and environmental strategy, customers are committed to adopting advanced air quality systems (AAQS) in their fleet.

AAQS systems are an important technological innovation that, as an environmental strategy, allows you to meet and exceed environmental regulatory standards.

Thanks to these exhaust gas cleaning systems or "scrubbers", air emissions in ports are improved in compliance with international air and water quality standards and in compliance with the 2020 regulations of the International Maritime Organization (IMO).

Our customers' goal is to invest in new technologies that enable sustainable navigation, such as battery systems for energy storage, air lubrication systems for submerged parts of the ship and increased *shore power* capacity.

Maintenance is scheduled to make heating, ventilation and air conditioning (HVCA) systems more efficient to minimize energy consumption.

New heat storage technologies are being tested to reduce emissions and Machine Learning and AI are being introduced to optimize energy distribution and use.

Also in this case, the communities concerned can use the whistleblowing reporting channel, accessible through a dedicated IT platform and compliant with whistleblower protection regulations. This system allows affected communities and third parties to report any violations, supporting transparency and respect for rights

## Interventions on impacts and risk management for affected communities (S3-4)

The double materiality analysis identified impacts and opportunities for local communities. The impacts include economic benefits, but also possible inconveniences, including those related to environmental and social issues.

In a non-systematic and structured way, the group operates with the aim of promoting employment and integration also through the promotion of educational and training programs, cultural and sporting activities.

## Objectives related to the management of impacts and significant risks (S3-5)

The group has not yet formalized objectives specifically related to the management of impacts and risks on affected communities.

In fact, these objectives translate into promoting increasingly cohesive partnerships in achieving ESG objectives shared with the group's stakeholders. We believe that only with collaboration and the creation of new synergies at all levels of the value chain can the expected results be achieved.

## S4

## CONSUMERS AND END USERS

### Interests and views of stakeholders (S4-SBM 2)

The group's activities are aimed at shipyards and shipping companies, which in turn offer navigation services to their end users, i.e. cruise and yacht passengers. As a result, De Wave's core business also has some repercussions on these users and end consumers.

The Group operates in constant dialogue with the customer, even if it has not identified specific listening channels, other than strictly commercial ones, placing customer satisfaction at the center of its strategy to consolidate customer loyalty.

### Relevant impacts, risks and opportunities and their interaction with the strategy and business model (S4-SBM 3)

The list of IROs sets out the sustainability-relevant elements that, if not properly managed, could cause negative impacts on personal health and safety.

	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale /Potenziale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	Avalle	Breve termine	Medio termine	Lungo termine
Salute e sicurezza	L'organizzazione, a causa di incidenti o danni alle persone derivanti dalla mancata messa in sicurezza degli ambienti allestiti, rischia di subire danni reputazionali e sanzioni.	R	Rischio		✓	✓	✓	
Sicurezza personale	L'organizzazione, a causa di danni alla salute delle persone a bordo derivanti da materiali tossici o dannosi utilizzati durante le attività di allestimento, rischia di subire danni reputazionali e sanzioni.	R	Rischio		✓	✓	✓	

In compliance with current regulations, the group adopts all precautions and procedures to limit and prevent the risks identified. The quality and safety of the product and services are at the heart of market strategies.

### Policies related to consumers and end-users (S4-1)

At the moment, a policy expressly dedicated to consumers and end users has not been formulated. The Quality certifications obtained by the group, however, are an example of the group's attention to the high quality level of processes and products.

The complexity of the business requires cooperation with our customers, whether shipyards or shipowners, to maintain high standards in terms of quality and technical regulatory compliance, at every stage of the production process.

The aim is to ensure maximum safety of the product and/or services used by the customer or end users.

### Consumer and end-user engagement processes on impacts (S4-2)

As mentioned above, the group's first customers are shipyards and shipping companies. Although there are no formal listening channels with these actors, in fact the very nature of the activities involves continuous involvement and collaboration for the entire duration of the project. This starts from the early stages, in which the concept is received from the customer and reworked up to an executive project, up to the final stages of construction and installation, which are carried out on board, therefore within the customers' space, and in coordination with the other players in their supply chain. Dialogue and confrontation are therefore assured and constant.

De Wave, on the other hand, does not have a direct relationship with the end consumers, i.e. the passengers of cruise ships and yachts, here the role of De Wave is subordinate to the action of its customers, whose impact limitation objectives and high safety standards we support.

De Wave shares with its customers the strategies for an increasingly safe and innovative cruise market.

### Remediation mechanisms and communication channels for end users (S4-3)

In relation to remedial mechanisms related to negative impacts on consumers and/or end-users, we reiterate our collaboration with our customers in adopting systems that make the ship "safe" and to be involved only reflexively regarding the channels that allow end-users to express concern.

### Interventions on impacts and risk management for end users (S4-4, 5)

Full compliance with the quality and safety standards dictated by customers and, more generally, by the control and governance bodies of the sector, are in themselves the widest guarantee of protection of the health and safety of customers, workers involved in assembly activities, and end consumers. Therefore, no further specific measures or interventions are necessary in this regard, and it can be said that the objectives for the management of impacts in fact coincide with the principle of compliance with safety standards.

The goal of our customers, which the group shares, is to build cruise ships, real floating cities, able to respect the ecosystems of the areas in which they operate, to safeguard the health and life of those who temporarily live there.

Cruise ships must have a valid class certificate, issued after verification of their compliance with the regulations of a classification body.

The classification body's first objective is to ensure that ships are designed, built and maintained in such a way as to minimize risks to life, the environment and property. The achievement of the class is the demonstration that all the checks in the various phases of the ship's life have been successful.

All equipment and equipment installed on board follow the manufacturer's standards and must comply with applicable national or international standards.

# GOVERNANCE INFORMATION

## G1 BUSINESS CONDUCT

### Role of administrative, management and control bodies (G1- GOV 1)

The De Wave group has adopted a traditional model of administration and business management, with a Board of Directors endowed with ordinary and extraordinary administration powers, whose chairman has the powers of legal representation of the company before third parties and in court, in addition to the corporate signature. To counterbalance the Board of Directors, De Wave has appointed a board of statutory auditors, with powers as required by law, i.e. corporate control and business management.

### Description of processes to identify and assess relevant impacts, risks and opportunities (G1- IRO 1)

The De Wave Group believes that it is critical to its success and reputation that any alleged violations or attempted violations of the Code of Ethics, policies or any applicable laws or regulations be promptly reported and dealt with properly to avoid harmful consequences

Below are the impacts that emerged as significant following the DMA

	Impatto (+/-) Rischio/Opp. /Potenziale	Attuale /Potenziale	Posizione nella catena del valore			Orizzonte temporale		
			A monte	Operazioni proprie	A valle	Breve termine	Medio termine	Lungo termine
Tutela dei whistleblower	De Wave, a causa del mancato rispetto della normativa sul whistleblowing, potrebbe non assicurare ai propri dipendenti la corretta tutela in caso di segnalazioni da parte degli stessi.	<span style="color: orange;">-</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>
"	De Wave, a causa della non corretta gestione delle segnalazioni anonime da parte dei propri dipendenti e del mancato rispetto della norma sul whistleblowing, rischia di incorrere in sanzioni e danni reputazionali.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		
Relazioni con i fornitori e pratiche di pagamento	De Wave potrebbe adottare pratiche commerciali scorrette con i propri fornitori in assenza di politiche in merito.	<span style="color: orange;">-</span>	Potenziale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>	
"	De Wave, a causa della non corretta gestione delle relazioni e dei pagamenti ai fornitori, rischia di porre fine ai rapporti con gli stessi, con conseguente aumento dei costi per la ricerca e selezione di nuovi fornitori.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>	
Cultura d'impresa	De Wave, a causa del mancato rispetto del codice etico aziendale da parte dei propri dipendenti, rischia di incorrere in sanzioni e danni reputazionali.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		
Corruzione e concussione	De Wave, a causa della mancata formazione e prevenzione in materia di corruzione, rischia che si verifichino incidenti e di incorrere in sanzioni e danni reputazionali.	<span style="color: yellow;">R</span>	Potenziale	<span style="color: green;">✓</span>		<span style="color: green;">✓</span>		

## Policies on business culture and business conduct (G1-1)

The De Wave Group is committed to conducting its business in an ethical manner and does not tolerate any violation of its Code of Ethics, procedures, or applicable laws or regulations by its employees or business partners.

To this end, it has adopted a Whistleblowing procedure, which establishes and details the standards relating to the reporting process, through which employees and business partners can report any alleged violation or attempted violation of the Code of Ethics.

The group has also equipped itself with a certified platform that allows the whistleblower to make reports even in a totally anonymous form.

Whistleblowing	2024	2023
N segnalazioni pervenute	0	0

The figures responsible for collecting reports and initiating investigations are the members of the SB and the group's HR and Finance managers. To date, no procedures have been formalized to investigate any reported wrongdoing.

The companies of the De Wave Group are committed to protecting those who report illegal behavior (or attempted behavior) in good faith from any form of retaliation, even if the issues raised prove to be unfounded.

Through the "Whistleblowing" platform, whistleblowers have the right to choose to make the report anonymous: in this way, the confidentiality of the identity of the writer and the content of the report is guaranteed through secure protocols and encryption tools that allow personal data and information provided to be protected.

The identity of the whistleblower is never revealed without his consent, except in the cases provided for by current legislation. The body responsible for managing reports is the Human Resources Office.

De Wave has launched a training course on the contents of Law 231. During 2023, this training was provided to the top and managerial figures of the companies De Wave, Tecnavi and Wingeco.

In 2024, the training was extended to all managerial figures (executives, middle managers and team managers) who joined the De Wave srl company during the year, a total of 9 people.

The functions most exposed to the risks of active and passive corruption are:

- The purchasing function, given the high volumes of materials and services purchased, the considerable number of suppliers involved
- Entities with commercial functions

To date, these functions have not yet been made explicit as subjects at risk within the anti-corruption policy.

## Supplier Relationship Management (G1-2)

The control of processes, products and services supplied by external parties is reported in the Quality Management System Manual: De Wave Group's goal is to guarantee the conformity of the supplies and fittings delivered to the Customer, ensured through checks on materials, components, services and processes, in relation to the relevance and complexity of the supply and the consequences of any defects.

To ensure the conformity of what is procured, the Purchasing Departments implement preventive checks on suppliers and receive feedback on any non-conformities, while the control of supplies, services and processes are entrusted to the outside and carried out by the executive functions of the order. In order to guarantee high quality standards in its products/fittings, De Wave uses only qualified suppliers, i.e. those suppliers who meet at least one of the following conditions:

- for at least two years they have been carrying out supplies and/or services with satisfactory results (free of non-conformities)
- or have passed the assessment by the QMS Manager

Although there is not yet an explicit reference to compliance with ESG criteria, in essence, both in the qualification and monitoring phases, emphasis is placed on safety, environment and protection of labour rights, with specific attention to the ethical, reputational and compliance aspects of suppliers. The qualification can also be revoked in the event that the number of non-conformities exceeds, over time, a set threshold.

No specific policies have been formulated regarding payments to SMEs.

## Prevention and detection of bribery and corruption (G1-3)

The companies of the group have adopted a Code of Ethics, which is an integral and substantial part of the Organization, Management and Control Model (OMM) and which sets out the principles to which the conduct of each of the recipients must comply (i.e. directors, statutory auditors and all members of the corporate bodies, employees of the companies, and collaborators and consultants acting in the name and/or on behalf of the Company)

This document recommends avoiding any action that could lead to unlawful pressure or, in any case, undue influence on the activities of officials or public service officers of a public administration or that could undermine the independence of judgment and/or decision-making of third parties. In the Code of Ethics, it is specified that all conduct aimed at acquiring preferential treatment in the conduct of any activity related to the company itself is subject to sanctions.

The document expressly prohibits offering, directly or indirectly, money, gifts or other benefits to officials of the public administration, in charge of public service and/or to persons connected to them by family relationships.

All aspects related to possible cases of corruption are therefore dealt with within the Code of Ethics and in the related training

At the moment, a criterion for the separation of investigators from the subjects under investigation has not yet been formalized, nor has the process of communication to the administrative, management and control bodies been formalized. The group aims to address these issues in the course of 2025.

The issue of corruption is widely dealt with in the context of training on crimes in the 231 area.

231 training is provided to all managerial figures (executives, middle managers and team managers), at the time of their entry into the company, without there being any particular reference to particularly exposed functions.

### Cases of active or passive corruption (G1-4)

During the year, there were no convictions, fines relating to cases of active or passive corruption, nor were any offences of any kind detected.

Casi di corruzione attiva/passiva	2024	2023
N di condanne	0	0
N di sanzioni	0	0
	<b>0</b>	<b>0</b>

### Payment Practices (G1-6)

The average number of days of late payment, calculated from the contractual end of the invoice, is 30.5 days, and drops slightly to 29.9, if weighted with the amount of the invoices

The figure was calculated by taking as a reference all the invoices of the companies De Wave, Tecnavi, Wingeco and Mobil Line, which alone represent more than 96% of the value of the group's production.

De Wave typically applies the following payment terms to its suppliers, depending on the category they belong to.

The rationale is to grant more advantageous terms to those types of suppliers who offer services with a strong use of the workforce, which is necessarily remunerated according to the standard times of remuneration, which rightly does not provide for deferrals.

Categoria fornitori	Termine pagamento (gg)
Servizi	0
Consulenti	30
Interinali	30
Montaggi a bordo	30
Viaggi	30
Materiali	60
Trasporti	60

As of 31/12/2024, there are no pending legal proceedings due to late payments.

## ANNEX A

ESRS	Disclosure Obligations	Paragraphs of the document	Information from other pieces of EU legislation as listed in Appendix B, if applicable
BP 1	General criteria for drafting	<i>General Criteria for Sustainability Drafting (BP-1)</i>	
BP 2	Disclosure in relation to specific circumstances	<i>Circumstantial Disclosures (BP-2)</i>	
GOV 1	Role of administrative, management and control bodies	<i>Role of administrative, management and control bodies (GOV-1)</i>	ESRS 2 GOV-1 Gender diversity in the Council paragraph 21 (d) - SFDR reference: Annex I, Table 1, indicator No 13 - Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II ESRS 2 GOV-1 Percentage of independent members of the Management Board, paragraph 21(e) - Benchmark Regulation Reference: Commission Delegated Regulation (EU) 2020/1816, Annex II
GOV 2	Information provided to the administrative, management and supervisory bodies of the undertaking and sustainability issues addressed by them	<i>Information provided to administrative, management and supervisory bodies on sustainability matters (GOV-2)</i>	
GOV 3	Integration of sustainability benefits into incentive systems	<i>Integration of sustainability performance into incentive systems (GOV-3, 4)</i>	
GOV 4	Due diligence statement	<i>Integration of sustainability performance into incentive systems (GOV-3, 4)</i>	ESRS 2 GOV-4 Due Diligence Statement paragraph 30 – SFDR Reference: Annex I, Table 3, Indicator No. 10
GOV 5	Risk management and internal controls on sustainability reporting	<i>Risk Management and Internal Controls on Sustainability Reporting (GOV-5)</i>	
SBM 1	Market position, strategy, business model and value chain	<i>Strategy, Business Model and Value Chain (SBM-1)</i>	ESRS 2 SBM-1 Involvement in activities related to activities in the fossil fuel sector, paragraph 40(d)(i) - SFDR reference: Annex I, Table 1, indicator 4 - Pillar 3 reference: Article 449a of Regulation (EU) N 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1 – Qualitative information on environmental risk and Table 2 – Qualitative information on social risk – Reference Benchmark Regulation: Commission Delegated Regulation (EU) 2020/1816, Annex II ESRS 2 SBM-1 Involvement in activities related to the production of chemicals, paragraph 40(d)(ii) - SFDR reference: Annex I, Table 2, indicator 9 -

			Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II ESRS 2 SBM-1 Participation in controversial weapons-related activities, paragraph 40(d)(iii) - SFDR reference: Annex I, Table 1, indicator 14 - Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 12(1) of Delegated Regulation (EU) 2020/1816, Annex II ESRS 2 SBM-1 Involvement in activities related to tobacco cultivation and production, paragraph 40(d)(iv) – Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 12(1) of Delegated Regulation (EU) 2020/1816, Annex II
SBM 2	Interests and views of stakeholders	<i>Interests and Views of Stakeholders (SBM-2)</i>	
SBM 3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	<i>Relevant impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3)</i>	ESRS 2- SBM3 - S1 Risk of Forced Labour paragraph 14, letter f) - SFDR Reference: Annex I, Table 3, Indicator No. 13 ESRS 2- SBM3 - S1 Risk of Child Labour paragraph 14, letter g) - SFDR Reference: Annex I, Table 3, Indicator No. 12 ESRS 2- SBM3 – S2 Serious risk of child labour or forced labour in the labour chain, paragraph 11(b) – SFDR reference: Annex I, Table 3, indicators nos. 12 and 13
IRO 1	Description of processes to identify and assess relevant climate-related impacts, risks and opportunities	<i>Identification of relevant impacts, risks and opportunities (IRO-1)</i>	ESRS 2- IRO 1 - E4 paragraph 16(a)(i) - SFDR reference: Annex I, Table 1, indicators 7 ESRS 2- IRO 1 - E4 paragraph 16(b) - SFDR reference: Annex I, Table 2, indicator 10 ESRS 2- IRO 1 - E4 paragraph 16(c) - SFDR reference: Annex I, Table 2, indicator 14
IRO 2	Disclosure requirements of ESRS covered by the company's sustainability statement	<i>Disclosure requirements of ESRS (IRO-2)</i>	
ESRS E1	E1-1 Climate Change Mitigation Transition Plan	<i>Climate Change Mitigation Transition Plan (E1-1)</i>	ESRS E1-1 Transition plan to achieve climate neutrality by 2050, paragraph 14 - EU climate law reference: Article 2(1) of Regulation (EU) 2021/1119 ESRS E1-1 Enterprises excluded from Paris-aligned benchmarks, paragraph 16(g) - Pillar 3 Reference: 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, issuance and residual maturity – Benchmark Regulation reference: Article 12(1), points (d) to (g), and (2)
	E1-2 Climate Change Mitigation and Adaptation Policies	<i>Climate Change Mitigation and Adaptation Policies (E1-2)</i>	

	E1-3 Climate change policy actions and resources	<i>Climate Change Policy Actions and Resources (E1-3, 4)</i>	
	E1-4 Climate change mitigation and adaptation objectives	<i>Climate Change Policy Actions and Resources (E1-3, 4)</i>	ESRS E1-4 GHG emission reduction targets, paragraph 34 - SFDR reference: Annex I, Table 2, indicator 4 - Pillar 3 reference: Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Indicators of potential transition risk related to climate change: alignment metrics – Benchmark Regulation reference: Article 6 of Delegated Regulation (EU) 2020/1818
	E1-5 Power Consumption and Energy Mix	<i>Energy consumption and energy mix (E1-5)</i>	ESRS E1-5 Energy consumption from fossil fuels disaggregated by source (high climate impact sectors only), paragraph 38 - SFDR reference: Annex I, Table 1, indicator 5 and Annex I, Table 2, indicator 5 ESRS E1-5 Energy Consumption and Energy Mix paragraph 37 - SFDR Reference: Annex I, Table 1, Indicator No. 5 ESRS E1-5 Energy intensity associated with activities in sectors with high climate impact, paragraphs 40 to 43 - SFDR reference: Annex I, Table 1, indicator No. 6
	E1-6 Scope 1, 2, 3 gross emissions and total GHG emissions	<i>Greenhouse gas emissions (E1-6)</i>	
	E1-7 GHG removals and GHG emission mitigation projects financed with carbon credits	<i>Not applicable</i>	ESRS E1-7 GHG removals and carbon credits, paragraph 56 - EU climate law reference: Article 2(1) of Regulation (EU) 2021/1119
	E1-8 Setting the internal carbon price	<i>Not applicable</i>	
	E1-9 Expected financial effects of material physical and transition risks and potential climate-related opportunities	<i>Phase-in</i>	ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66 – Benchmark Regulation reference: Annex II to Delegated Regulation (EU) 2020/1818 and Annex II to Delegated Regulation (EU) 2020/1816 ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a) ESRS E1-9 Position of significant assets at material physical risk, paragraph 66(c) – Pillar Three Reference: Article 449a of Regulation (EU) No 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking book – Indicators of potential physical risk related to climate change: exposures subject to physical risk ESRS E1-9 Carrying amount of its immovable assets by energy efficiency classes, paragraph 67(c) - Pillar 3 reference: Article 449a of Regulation (EU) No 575/2013; point 34 of Commission

			Implementing Regulation (EU) 2022/2453; Template 2: Banking book – Indicators of potential transition risk related to climate change: loans secured by real estate – Energy efficiency of collateral ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69 – Benchmark Regulation reference: Annex II to Delegated Regulation (EU) 2020/1818
ESRS E2	E2-1 Pollution policies	<i>Pollution policies (E2-1)</i>	
	E2-2 Pollution-related actions and resources	<i>Pollution-related actions and resources (E2-2)</i>	
	E2-3 – Pollution-related targets	<i>Pollution-related targets (E2-3)</i>	
	E2-4 – Air, water and soil pollution	<i>Air, water and soil pollution (E2-4)</i>	ESRS E2-4 Quantities of each pollutant listed in Annex II of Regulation E-PRTR (European Pollutant Release and Transfer Register) issued to air, water and soil, paragraph 28 - SFDR reference: Annex I, Table 1, indicator 8; Annex I, Table 2, Indicator 2; Annex 1, Table 2, Indicator No. 1; Annex I, Table 2, Indicator 3
	E2-5 Substances of concern and substances of very high concern	<i>Substances of concern and substances of very high concern (E2-5)</i>	
	E2-6 Expected financial effects of pollution-related impacts, risks and opportunities	<i>Phase-in</i>	
ESRS E3	E3-1 Policies related to water and marine resources	<i>Policies, targets and actions related to water consumption (E3-1, 2, 3)</i>	ESRS E3-1 Marine Waters and Resources, paragraph 9 - SFDR Reference: Annex I, Table 2, Indicator 7 ESRS E3-1 Dedicated Policy, paragraph 13 - SFDR Reference: Annex I, Table 2, Indicator No. 8 ESRS E3-1 Sustainability of the oceans and seas paragraph 14 - SFDR reference: Annex I, Table 2, indicator No. 12
	E3-2 Actions and resources related to water and marine resources	<i>Policies, targets and actions related to water consumption (E3-1, 2, 3)</i>	
	E3-3 Water and Marine Resources Objectives	<i>Policies, targets and actions related to water consumption (E3-1, 2, 3)</i>	
	E3-4 Water Consumption	<i>Water Consumption (E3-4)</i>	ESRS E3-4 Total Recycled and Reused Water, paragraph 28(c) - SFDR Reference: Annex I, Table 2, Indicator No. 6.2 ESRS E3-4 Total water consumption in m <sup>3</sup> as a percentage of net revenues from own operations, paragraph 29 - SFDR reference: Annex I, Table 2, indicator no. 6.1

	E3-5 Expected financial effects from impacts, risks and opportunities related to water and marine resources	<i>Phase-in</i>	
ESRS E4	E4-1 Transition Plan and Focus on Biodiversity and Ecosystems in Strategy and Business Model	<i>Not relevant</i>	
	E4-2 — Biodiversity and Ecosystem Policies	<i>Not relevant</i>	ESRS E4-2 Sustainable agricultural/land use policies or practices, paragraph 24(b) - SFDR reference: Annex I, Table 2, indicator 11 ESRS E4-2 Sustainable sea/ocean use practices or policies, paragraph 24(c) - SFDR reference: Annex I, Table 2, indicator 12 ESRS E4-2 Policies to address deforestation, paragraph 24(d) - SFDR reference: Annex I, Table 2, indicator 15
	E4-3 — Actions and resources related to biodiversity and ecosystems	<i>Not relevant</i>	
	E4-4 Biodiversity and Ecosystem Targets	<i>Not relevant</i>	
	E4-5 — Impact metrics related to biodiversity and ecosystem changes	<i>Not relevant</i>	
	E4-6 Expected financial effects from risks and opportunities related to biodiversity and ecosystems	<i>Not relevant</i>	
ESRS E5	E5-1 Policies related to the use of resources and the circular economy	<i>Policies related to resource use and the circular economy (E5-1)</i>	
	E5-2 Actions and resources related to resource use and the circular economy	<i>Actions and resources related to resource use and the circular economy (E5-2)</i>	
	E5-3 Objectives related to the use of resources and the circular economy	<i>Objectives related to the use of resources and the circular economy (E5-3)</i>	
	E5-4 Inbound Resource Flows	<i>Inbound Resource Flows (E5-4)</i>	
	E5-5 Outbound Resource Flows	<i>Outbound resource flows (E5-5)</i>	ESRS E5-5 Non-recycled waste, paragraph 37(d) - SFDR reference: Annex I, Table 2, indicator 13

			ESRS E5-5 Hazardous Waste and Radioactive Waste, paragraph 39 - SFDR Reference: Annex I, Table 1, Indicator No. 9
	E5-6 Expected financial effects deriving from impacts, risks and opportunities related to the use of resources and the circular economy	<i>Phase-in</i>	
ESRS S1	S1-1 – Own Workforce Policies	<i>Own Labour Policies (S1-1)</i>	<p>ESRS S1-1 Political commitments on human rights, paragraph 20 - SFDR reference: Annex I, Table 3, Indicator No. 9 and Annex I, Table 1, Indicator No. 11</p> <p>ESRS S1-1 Due diligence policies on matters covered by International Labour Organization Core Conventions 1 to 8, paragraph 21 - Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II</p> <p>ESRS S1-1 Procedures and measures to prevent trafficking in human beings, paragraph 22 - SFDR reference: Annex I, Table 3, indicator No. 11</p> <p>ESRS S1-1 Occupational Accident Prevention Policy or Management System, Paragraph 23 - SFDR Reference: Annex I, Table 3, Indicator No. 1</p>
	S1-2 Processes for the involvement of own workers and workers' representatives regarding impacts	<i>Involvement of workers and their representatives (S1-2)</i>	
	S1-3 Processes to Remedy Negative Impacts and Channels for Workers to Raise Concerns	<i>Processes for remedying negative impacts and communication channels with own workers (S1-3)</i>	ESRS S1-3 Complaint/Complaint Handling Mechanisms, paragraph 32(c) - SFDR Reference: Annex I, Table 3, Indicator 5
	S1-4 – Interventions on material impacts for the own workforce and approaches for the mitigation of material risks and the pursuit of material opportunities in relation to the own workforce, as well as effectiveness of such actions	<i>Interventions on impacts, approaches for risk management and the pursuit of relevant opportunities in relation to the own workforce (S1-4)</i>	
	S1-5 Objectives related to the management of material negative impacts, the enhancement of positive impacts and the management of	<i>Objectives related to the management of negative impacts, the enhancement of positive impacts and the management of risks and opportunities (S1-5)</i>	

	material risks and opportunities		
S1-6 – Characteristics of the Employees of the Enterprise	<i>Characteristics of the company's employees (S1-6)</i>		
S1-7 Characteristics of non-employees in the firm's own workforce	<i>Characteristics of self-employed persons in the own workforce (S1-7)</i>		
S1-8 Collective bargaining coverage and social dialogue	<i>Not relevant</i>		
S1-9 Diversity Metrics	<i>Diversity metrics (S1-9)</i>		
S1-10 Adjusted Wages	<i>Adjusted wages (S1-10)</i>		
S1-11 Social protection	<i>Social protection (S1-11)</i>		
S1-12 Persons with Disabilities	<i>People with disabilities (S1-12)</i>		
S1-13 Training and Skills Development Metrics	<i>Training and Skills Development Metrics (S1-13)</i>		
S1-14 Health and Safety Metrics	<i>Health and Safety Metrics (S1-14)</i>	ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88(b) and (c) - SFDR reference: Annex I, Table 3, indicator 2 - Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II ESRS S1-14 Number of days lost due to injuries, injuries, fatalities or illnesses, paragraph 88(e) - SFDR reference: Annex I, Table 3, indicator 3	
S1-15 Work-Life Balance Metrics	<i>Work-life balance metrics (S1-15)</i>		
S1-16 – Compensation metrics (pay gap and total pay)	<i>Compensation metrics (S1-16)</i>	ESRS S1-16 Unadjusted Gender Pay Gap, paragraph 97(a) - SFDR Reference: Annex I, Table 1, Indicator 12 - Benchmark Regulation Reference: Commission Delegated Regulation (EU) 2020/1816, Annex II	
S1-17 – Human Rights Incidents, Complaints, and Serious Impacts	<i>Not relevant</i>	ESRS S1-17 Incidents related to discrimination, paragraph 103(a) - SFDR reference: Annex I, Table 3, indicator 7 ESRS S1-17 Non-compliance with the United Nations and OECD Guiding Principles on Business and Human Rights, paragraph 104(a) – SFDR reference: Annex I, Table 1, indicator 10 and Annex I, Table 3, indicator 14 – Benchmark Regulation reference: Annex II to Delegated Regulation (EU) 2020/1816 and Article 12(1), of Delegated Regulation (EU) 2020/1818	
ESRS S2	S2-1 Policies related to workers in the value chain	<i>Policies related to workers in the value chain (S2-1)</i>	ESRS S2-1 Political commitments on human rights, paragraph 17 - SFDR reference: Annex I, Table 3, indicator No. 9 and Annex I, Table 1, indicator No. 11 ESRS S2-1 Policies related to workers in the value chain, paragraph 18 - SFDR reference: Annex I, Table 3, indicators no. 11 and 4

			<p>ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines – SFDR Reference: Annex I, Table 1, Indicator No 10 – Benchmark Regulation Reference: Annex II to Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818</p> <p>ESRS S2-1 Due diligence policies on matters covered by International Labour Organization Core Conventions 1 to 8, paragraph 19 – Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II</p>
S2-2 Worker engagement processes in the value chain with regard to impacts	<i>Processes of worker involvement in the value chain (S2-2)</i>		
S2-3 Processes to remedy negative impacts and channels that allow workers in the value chain to express concerns	<i>Remediation processes for negative impacts and communication channels (S2-3)</i>		
S2-4 Interventions on material impacts for workers in the value chain and approaches for managing material risks and achieving relevant opportunities for workers in the value chain, as well as effectiveness of such actions	<i>Interventions on relevant impacts and approaches for risk management for workers in the value chain (S2-4)</i>		
S2-5 Objectives related to the management of material adverse impacts, enhancement of positive impacts and management of material risks and opportunities	<i>Objectives for the management of negative impacts and risks and for the enhancement of positive impacts and opportunities (S2-5)</i>		
ESRS S3	S3-1 Policies Relating to Affected Communities	<i>Policies relating to affected communities (S3-1)</i>	<p>ESRS S3-1 Political commitments on human rights, paragraph 16 - SFDR reference: Annex I, Table 3, indicator No. 9 and Annex I, Table 1, indicator No. 11</p> <p>ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO Principles or OECD Guidelines, paragraph 17 – SFDR Reference: Annex I, Table 1, Indicator No 10 – Benchmark Regulation Reference: Annex II to Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818</p>

	S3-2 Affected Community Engagement Processes on Impacts	<i>Affected community engagement processes on impacts (S3-2)</i>	
	S3-3 Processes to Remediate Negative Impacts and Channels for Affected Communities to Express Concerns	<i>Processes for remedying negative impacts and channels for affected communities to express concerns (S3-3)</i>	
	S3-4 Interventions on material impacts on affected communities and approaches to manage material risks and achieve relevant opportunities for affected communities, as well as effectiveness of such actions	<i>Interventions on impacts and risk management for affected communities (S3-4)</i>	ESRS S3-4 Human Rights Issues and Incidents, paragraph 36 - SFDR Reference: Annex I, Table 3, Indicator No. 14
	S3-5 Objectives related to the management of material negative impacts, the enhancement of positive impacts and the management of material risks and opportunities	<i>Objectives related to the management of impacts and significant risks (S3-5)</i>	
ESRS S4	S4-1 Consumer and end-user policies	<i>Policies related to consumers and end-users (S4-1)</i>	ESRS S4-1 Consumer and end-user related policies, paragraph 16 - SFDR reference: Annex I, Table 3, indicator No. 9 and Annex I, Table 1, indicator No. 11 ESRS S4-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17 - SFDR reference: Annex I, Table 1, indicator no. 10 - Benchmark Regulation reference: Annex II to Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818
	S4-2 Consumer and end-user engagement processes on impacts	<i>Consumer and end-user engagement processes on impacts (S4-2)</i>	
	S4-3 Processes to Remedy Negative Impacts and Channels for Consumers and End-Users to Express Concerns	<i>Remediation mechanisms and communication channels for end users (S4-3)</i>	
	S4-4 Interventions on material impacts for consumers and end-	<i>Interventions on impacts and risk management for end users (S4-4, 5)</i>	ESRS S4-4 Human Rights Issues and Incidents, paragraph 35 - SFDR Reference: Annex I, Table 3, Indicator No. 14

	users and approaches for the mitigation of material risks and the achievement of material opportunities in relation to consumers and end-users, as well as effectiveness of such actions		
	S4-5 Objectives related to the management of material negative impacts, the enhancement of positive impacts and the management of material risks and opportunities	<i>Interventions on impacts and risk management for end users (S4-4, 5)</i>	
ESRS G1	G1-1 Policies on business culture and business conduct	<i>Policies on business culture and business conduct (G1-1)</i>	ESRS G1-1 United Nations Convention against Corruption, paragraph 10(b) - SFDR reference: Annex I, Table 3, indicator No. 15 ESRS G1-1 Whistleblower Protection, paragraph 10(d) - SFDR Reference: Annex I, Table 3, Indicator No. 6
	G1-2 Supplier Relationship Management	<i>Supplier Relationship Management (G1-2)</i>	
	G1-3 Prevention and detection of bribery and corruption	<i>Prevention and detection of bribery and corruption (G1-3)</i>	
	G1-4 Established cases of active or passive corruption	<i>Cases of active or passive corruption (G1-4)</i>	ESRS G1-4 Fines imposed for breaches of anti-bribery and corruption laws, paragraph 24(a) – SFDR Reference: Annex I, Table 3, Indicator No 17 – Benchmark Regulation Reference: Annex II to Delegated Regulation (EU) 2020/1816 ESRS G1-4 Anti-corruption and bribery rules, paragraph 24(b) - SFDR reference: Annex I, Table 3, indicator 16
	G1-5 Political influence and lobbying	<i>Not relevant</i>	
	G1-6 Payment Practices	<i>Payment Practices (G1-6)</i>	