



KIRCHNER

Fired heaters for refineries and petrochemical plants

PAID UP SHARE CAPITAL EURO 1.000.000,00

INTEGRATED POLICY for Quality, Environment, Health, Safety and Sustainability

FOREWORD

Kirchner Italia S.p.A. adopts this Integrated Policy as a fundamental component of its Management System. The Company undertakes to conduct its business activities in compliance with the requirements of **ISO 9001:2015** (Quality), **ISO 14001:2015** (Environment) and **ISO 45001:2018** (Occupational Health and Safety), as well as in accordance with **Environment, Social, Governance (ESG)** sustainability principles.

This Policy reflects Senior Management's commitment to promoting an integrated approach to the management of quality, environmental performance, occupational health and safety, and corporate sustainability. Through this approach, the Company aims to achieve operational excellence and ensure continuous improvement across all its processes.

1. SCOPE

This Policy applies to all Kirchner Italia activities, processes, products and services. It encompasses every level of the organisation, including staff, supply chain partners and external stakeholders.

2. GENERAL PRINCIPLES

Kirchner Italia's Senior Management is committed to:

- Ensuring compliance with all applicable legal and regulatory requirements relating to quality, the environment, and occupational health and safety, as well as with any voluntary commitments undertaken by the organisation;
- Assuring customer satisfaction by delivering products and services that meet contractual requirements and expectations, while striving for excellence in quality;
- Promoting environmental protection by reducing environmental impacts, using natural resources efficiently, and managing waste responsibly;
- Providing safe and healthy working conditions in order to prevent accidents at work and occupational illnesses, and fostering a strong safety culture at all organisational levels;
- Adopting a risk-based thinking approach to identify, assess and manage risks and opportunities associated with company processes;
- Promoting continuous improvement of Integrated Management System performance by monitoring goals, analysing data and implementing corrective and preventive actions;
- Providing the human, technical, financial and informational resources required to effectively implement and maintain the Integrated Management System;
- Ensuring the consultation and participation of workers and their representatives in decisions relating to occupational health and safety;
- Promoting staff training, awareness and competence on matters relating to quality, the environment, occupational health and safety, and sustainability;
- Communicating this Policy transparently to all relevant internal and external stakeholders and making it publicly available.

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GOVERNMENT TAX AND VAT REGISTRATION No.
NATIONAL CHAMBER OF COMMERCE OF MILAN REGISTRATION No.
COMPANY REGISTRY OFFICE OF MILAN No.

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3. QUALITY COMMITMENTS (ISO 9001:2015)

Kirchner Italia is committed to:

- Understanding customer needs and expectations, and converting them into clearly defined and measurable requirements;
- Ensuring that products and services consistently meet customer requirements as well as applicable laws and regulations;
- Applying a process approach to the management of company activities, identifying process interactions and optimising performance;
- Setting measurable quality objectives that are aligned with the Company's context and strategy, and monitoring their achievement;
- Managing suppliers and commercial partners effectively, assessing their performance against defined criteria;
- Implementing a management system for complaints and nonconformities to ensure timely and appropriate responses;
- Promoting innovation and the continuous improvement of operational and organisational processes.

4. ENVIRONMENTAL COMMITMENTS (ISO 14001:2015)

Kirchner Italia is committed to:

- Identifying and assessing the significant environmental aspects of its activities, products and services, and defining actions to reduce their negative impacts;
- Ensuring compliance with applicable environmental laws and regulations and with other obligations undertaken by the organisation;
- Promoting the sustainable use of resources through practices and procedures that improve efficiency and reduce waste;
- Managing waste in accordance with the European waste hierarchy (prevention, reuse, recycling, recovery and disposal);
- Preventing all forms of pollution, specifically air and water pollution by adopting clean technologies and sustainable processes;
- Reporting environmental performance transparently to stakeholders and promoting responsible practices throughout the supply chain.

5. OCCUPATIONAL HEALTH AND SAFETY COMMITMENTS (ISO 45001:2018)

Kirchner Italia is committed to:

- Identifying workplace hazards, assessing occupational health and safety risks and implementing appropriate and effective control measures;
- Ensuring that workplaces, equipment, processes and substances are safe and compliant with applicable health and safety laws and regulations;
- Eliminating hazards and reducing occupational health and safety risks through the hierarchy of controls (elimination, substitution, engineering controls, administrative controls and personal protective equipment);
- Consulting and actively involving workers and their representatives in all matters relating to occupational health and safety, and recognising their contribution to the Management System;
- Providing all workers with appropriate information, instruction and training on specific risks and the preventive and protective measures in place;
- Fostering a safety culture based on leadership, individual accountability and proactive behaviour;
- Preparing for and responding effectively to emergencies through plans, procedures and regular drills;
- Monitoring workers' health through occupational health surveillance programmes and promoting organisational wellbeing;
- Pursuing the goal of zero accidents and continuously improving occupational health and safety performance.



6. COMMITMENTS TO SUSTAINABILITY AND ESG PRINCIPLES

Kirchner Italia recognises sustainability as a strategic driver of long-term value and is committed to integrating Environmental, Social and Governance (ESG) principles into its business activities and decision-making processes.

6.1 Environment

- Reducing its carbon footprint through the use of renewable energy sources;
- Implementing circular economy principles to minimise waste and maximise the reuse and recycling of materials;
- Assessing and reducing environmental impact across the entire product lifecycle;
- Promoting responsible and sustainable procurement of raw materials and components;
- Monitoring and reporting environmental performance.

6.2 Social



- Respecting human rights and fundamental labour principles in line with the conventions of the International Labour Organization (ILO), wherever possible;
- Promoting diversity, inclusion and gender equality across all processes of human resources management from recruitment to development;
- Ensuring fair, dignified working conditions that support a healthy work-life balance;
- Investing in continuous training and professional development for staff;
- Supporting organisational and psychosocial wellbeing, and preventing risks such as work-related stress, bullying and harassment and discrimination in the workplace;
- Ensuring product safety and quality to protect the health and safety of end consumers;
- Promoting ethical practices within the supply chain and requiring suppliers to comply with social and environmental standards.

6.3 Governance

- Conducting business with transparency, integrity and ethical behaviour, in accordance with the Company's Code of Ethics and its Organisation, Management and Control Model under Legislative Decree 231/2001, where applicable;
- Preventing and addressing corruption, fraud and conflicts of interest through internal control procedures;
- Ensuring regulatory compliance across all areas of the organisation's operations;
- Promoting responsible and sustainable governance through stakeholder engagement and transparent reporting practices;
- Protecting personal data and privacy in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679).

7. COMPLIANCE WITH EXTERNAL SUSTAINABILITY STANDARDS

Kirchner Italia measures its sustainability performance against the requirements of recognised standards and assessment frameworks. To this end, the Company is committed to:

- Providing complete, transparent documented evidence of its certifications, policies, procedures and practices relating to environmental protection, labour and human rights, business ethics and sustainable procurement, wherever possible;
 - Monitoring and improving its sustainability ratings through targeted corrective actions;
 - Extending sustainability principles throughout the supply chain, requiring key suppliers to undergo equivalent sustainability assessments;
 - Sharing ESG information with customers and stakeholders, keeping environmental, social and governance performance data and documentation up to date;
 - Actively collaborating with partners to promote sustainable practices across the supply chain;
 - Supporting customer audits where required, in order to demonstrate compliance and performance.
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8. MANAGEMENT COMMITMENT

Management promotes a corporate culture based on accountability, transparency, and respect for people and the environment, recognising sustainability as a key driver of competitiveness and long-term value creation.

Ultimate accountability for the implementation of this Integrated Policy rests with Kirchner Italia's Management. However, every member of the organisation, at all levels, is responsible for applying the principles and commitments set out in this Policy within the scope of their respective roles and responsibilities.

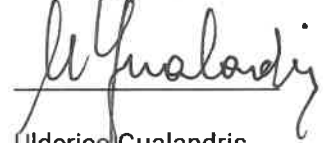
This Policy is subject to periodic Management review.

This Policy is made available to all relevant stakeholders - including customers, suppliers, partners, certification bodies and the local community - via the Company's official website.

The Kirchner Italia Management formally endorses this Integrated Policy and undertakes to provide the leadership, resources and support necessary for its full implementation.

Place and Date: MILAN, 10 March 2026

For the Management:



Ulderico Gualandris
President & CEO

