

S U S T A I N A B I L I T Y R E P O R T 2 0 2 2



COMELIT[®]
WITH • YOU • ALWAYS

SUSTAINABILITY
REPORT
2022

COMELIT[®]
WITH • YOU • ALWAYS



Dear Colleagues, Customers and Suppliers,

Once again this year, I am pleased to present the Sustainability Report of Comelit Group S.p.A.

At Comelit, we believe that the most important thing to succeed in life and in the world of work is to be part of **a team**, made up of members who deeply believe in common values, who work together to achieve the same goals and who are linked by a relationship based on **mutual trust**.

But, for this to happen, there must be **respect** upstream: respect for people and for the environment in which we live. This attitude, which constitutes a social and moral duty, is one of the core values of Comelit's governance.

After all, our mission is clear, as is our commitment: **to create a safer world**, through sustainable and technologically advanced products. And the basis for this goal is encouraging a culture of respect.

Likewise, respect is also the foundation of another value we believe in: **inclusion**. Breaking down barriers between people is the way to create a world where everyone can be and feel welcomed and valued.

Finally, we believe in the value of **sustainability** and are committed to disseminating such a culture, internally and in our supply chain. That's why we select suppliers who share our corporate values and promote ecological and sustainable practices in the production process.

The way forward is mapped out as such. But it's how we go ahead that shapes our journey. The determiners of our success are values such as trust, respect, sustainability, the centrality of people and collective intelligence.

This Sustainability Report, which provides a snapshot of our activities last year, represents the solid foundation of a project that we have undertaken and intend to develop in the future. A project that we want to propose to all of you, for it to become an opportunity for reflection and shared work.

**EDOARDO
BARZASI**

Chief Executive
Officer

Sustainable
development
is the true
challenge of our
times, which we
must all face.

LETTER TO STAKEHOLDERS

GRI 2-22

INTRODUCTION TO THE SUSTAINABILITY REPORT 2022

The Comelit Group's second Sustainability Report comes in the footsteps of a journey embarked on last year, by analysing in greater depth the material topics we have identified to assess not only the main environmental, social and governance impacts, but also the characteristics of the company's business model, reiterating the centrality of people in our value system: "With you. Always".

The increasing centrality of the Sustainable Development Goals (SDGs) in public policy and the fact that consumers are more and more attentive to the social and environmental dimension of the products they buy and the companies that produce them has led us to publish this sustainability report, drawn up according to the **international standards of the Global Reporting Initiative (GRI)** and available for consultation by all our stakeholders. The document refers to all Group companies and has been produced by means of an information collection process that involved different business areas and our international subsidiaries.

The **materiality analysis** has enabled us to identify the most significant sustainability issues, both for Comelit and for our main stakeholders, for inclusion in this report. We have decided to report the themes and the main results according to three now-consolidated pillars:

- With You. Always!
- People with us
- Comelit with the Planet

Sustainability is a central element of our strategies, the prerequisite that guides us and a continuous lever for development.

Being a 'sustainable' company is a path we are determinedly committed to following every day: a daily commitment between us, to our customers and to all our stakeholders. A challenge that we are facing with passion, taking concrete steps day after day.

For us, 'sustainability' means the ability for our actions to benefit the company through continuous improvement, including by generating value in the environment around us. At the same time, this commitment is a great responsibility but also a major opportunity, which we want to grasp and cultivate.

WITH
YOU
ALWAYS

WITH YOU. ALWAYS!

With our customers, always. For Comelit, this isn't just a claim; it's our business concept. With the aim of always remaining close to customers, Comelit provides efficient, safe and functional equipment, constantly supporting those who use what we produce in their everyday lives.



PEOPLE WITH US

At Comelit, proximity to people begins in the company with its collaborators, and is then developed in all relations with other stakeholders. For Comelit, focusing its objectives on collaborators equates to guaranteeing training, safety and well-being for each and every one of them.



COMELIT WITH THE PLANET

Comelit aims is to be synonymous with safety, not only for our customers, but for everyone, always. For Comelit, the requirement to focus the corporate strategy on sustainability and all its economic, social and environmental aspects is a commitment, expressed through everyday and concrete decisions.

01

02

03



ABOUT US

The Comelit Group in 2022¹² // Deep roots, global vision Since 1956¹⁴
 // Comelit worldwide¹⁶ // Our Group today¹⁸ // Corporate structure²⁰
 // Our story²² // With You. Always! Our promise, our commitment²⁶
 // Code of Ethics²⁸ // Our Vision³² // Our Mission³⁴ // Our business³⁶
 // Standards-based quality³⁸ // A great accolade⁴⁰
 // Sustainability governance⁴²

01

SUSTAINABILITY AT COMELIT

Sustainability at Comelit⁴⁶ // Materiality analysis⁵⁰
 // Sustainability Plan⁵⁴

02

WITH YOU. ALWAYS!

“With You. Always!”⁵⁸ // Innovation, research and development⁶⁰
 // Customer centricity⁶⁴ // Data privacy and cybersecurity⁷⁰
 // IT governance⁷⁸

03

PEOPLE WITH US

“People with us”⁸² // Development and enhancement of
 human capital⁸⁶ // Collaborator health, safety and well-being⁹⁶
 // Diversity and inclusion¹⁰² // Community support¹⁰⁶
 // Sustainable supply management¹⁰⁸
 // Responsible business and anti-corruption¹¹²

04

COMELIT WITH THE PLANET

“Comelit with the Planet”¹¹⁸ // Energy efficiency and reduction
 of emissions¹²⁰ // Circular economy and waste management¹²⁴
 // Sustainable product design¹³⁰ // Sustainable packaging¹³⁴
 // Sustainable logistics¹³⁸

05

NOTE ON METHODOLOGY

06

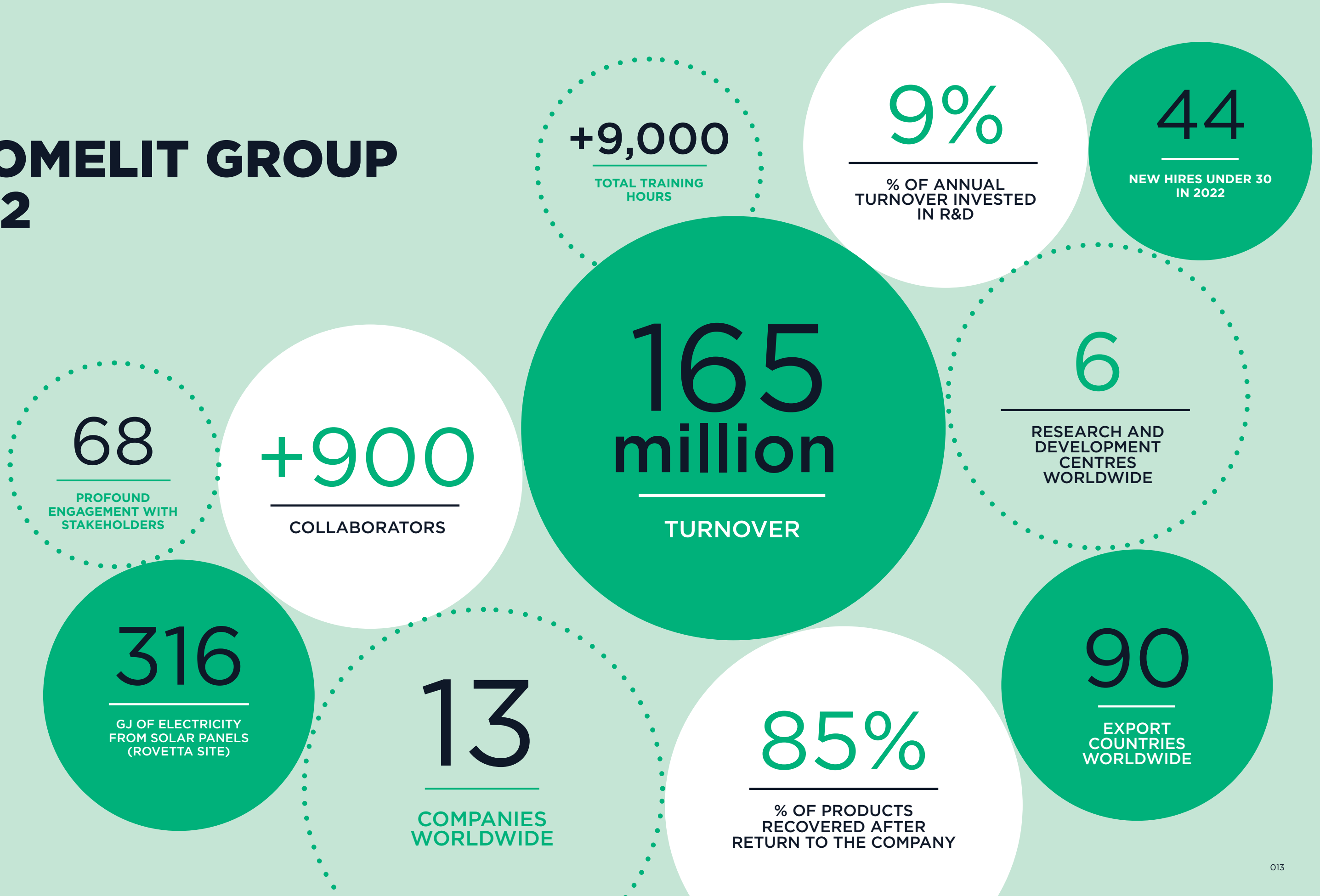


01

ABOUT US

The Comelit Group in 2022¹²
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// Sustainability governance⁴²

THE COMELIT GROUP IN 2022





01.1

DEEP ROOTS, GLOBAL VISION. SINCE 1956

The Comelit Group was founded in **1956**, when electronics was in its early days. Over the course of more than half a century, it has been characterised by an extraordinary evolution that has involved both **innovation in products** and their constantly increasing technology, designed to maintain the right balance between **design and functionality**, and the changes in the requirements of its customers, i.e. the installers and wholesalers who deal with the distribution of the products to the end consumer.

The long-standing hallmarks of the Comelit Group and its operations are the **will and ability to be**

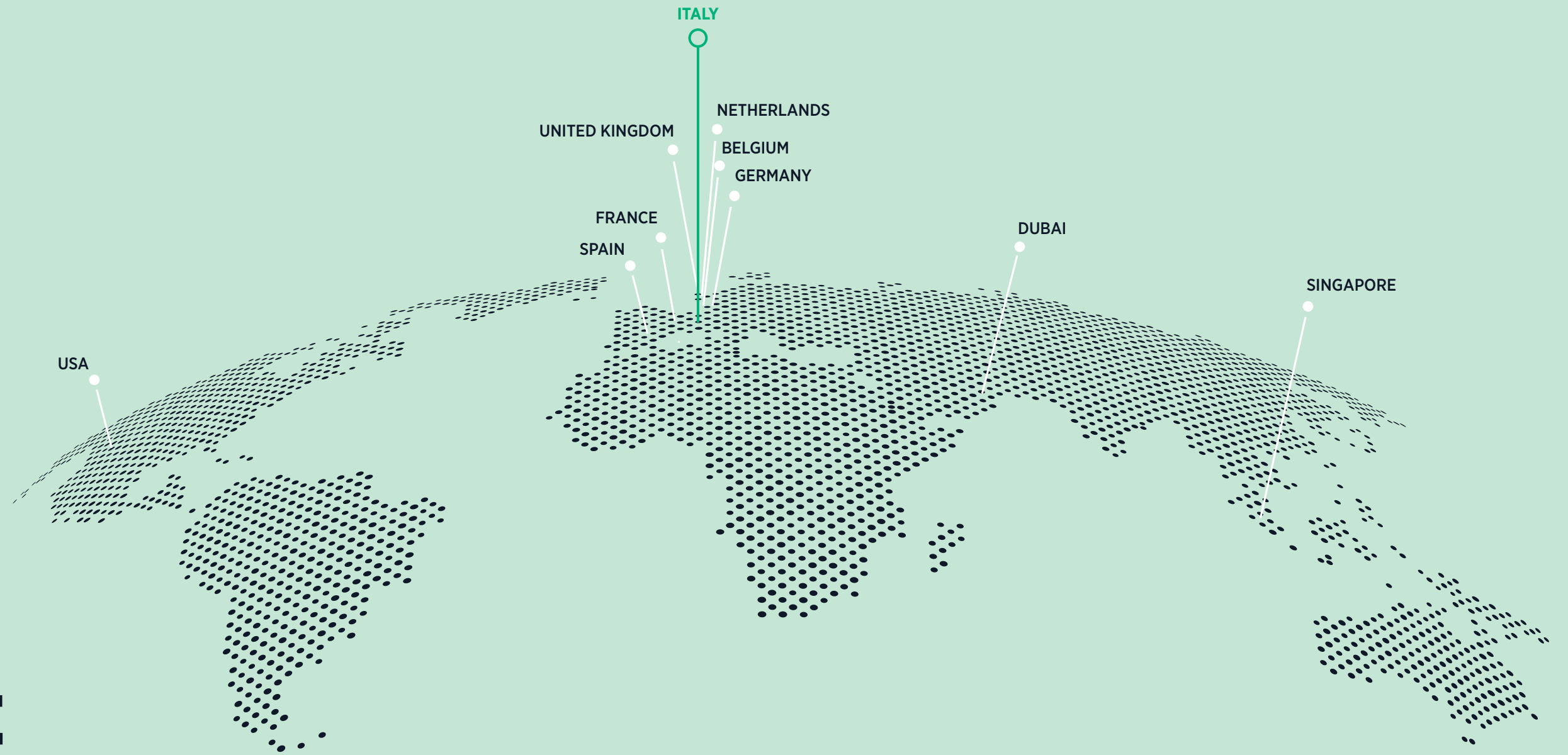
there at all times for people, whether customers, collaborators, suppliers or distributors, offering them the best product and service solutions. Comelit's business is therefore not limited to the design and distribution of safe, high-quality products, but also includes **training and assistance** services.

These days, Comelit is an international group specialised in the **design and manufacture of door entry monitors, video surveillance, intrusion detection, home automation, access control and fire protection**.

**THE LONG-STANDING HALLMARKS OF THE COMELIT GROUP
AND ITS OPERATIONS ARE THE WILL AND ABILITY TO BE
THERE AT ALL TIMES FOR PEOPLE.**



01.2 COMELIT WORLDWIDE



Comelit's strong international vocation originates from its close ties with the area where it was founded and where its headquarters are still located today, in the upper Val Seriana. Comelit has 13 companies located in strategic areas around the world, including nine branches and four representative offices, as well as six R&D centres.

GRI 2-1
GRI 2-6

The Comelit Group's expansion process began in **1996**, starting from Europe with the opening of the first branch in Lyon, France. Further branches then followed in the Netherlands, Spain, Belgium, the United Kingdom, Germany, the USA, Singapore and Dubai. **The Group exports to over 90 countries worldwide:** this complex sales structure integrates shared know-how with the awareness of specific requirements in each market.

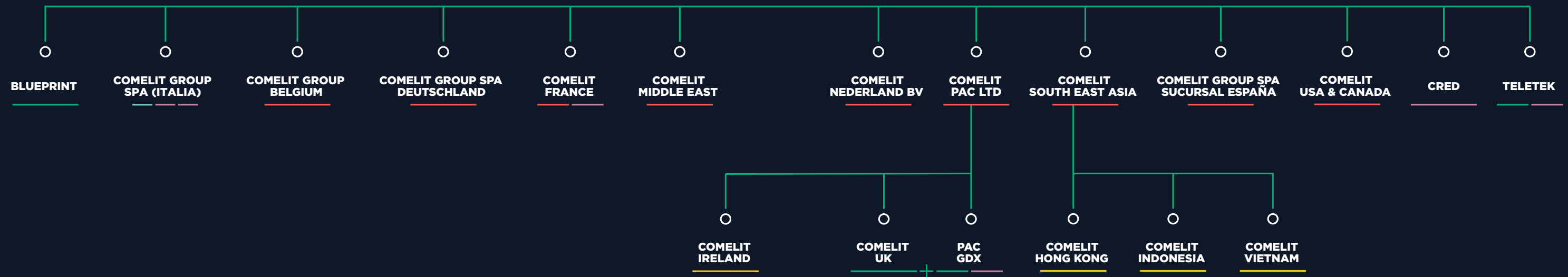
The Group's excellence has also received major recognition all over the world, as a result of truly prestigious installations: from Manhattan – where the Group was involved in the construction of Stuy Town, a large residential complex – and The Caribbean in Singapore to the luxurious Tour Odéon in Monte Carlo, the Markthal (a well-known covered market in Rotterdam) and the UpTown project, the first zero-impact district in Italy, located at the former Expo site in Cascina Merlata, just outside Milan.

13 COMPANIES



1 HEADQUARTERS + 9 BRANCHES + 4 REP. OFFICES + 6 R&D CENTRES

COMELIT GROUP SPA



OUR GROUP TODAY



The corporate structure of Comelit includes a Board of Directors consisting of four members: the company President, the Chief Executive Officer and two other directors. There is also a Board of Statutory Auditors consisting of five members, none of whom are on the Board of Directors. In addition to the Chief Executive and the President, the company's Executive Board consists of eight directors who lead one division each and report directly to the CEO.

01.3

CORPORATE STRUCTURE

GRI 2-9



PRESIDENT
Silvia Brasi



VICE-PRESIDENT & EXECUTIVE DIRECTOR
Edoardo Barzasi



EXECUTIVE DIRECTOR
Alberto Lazzari



EXECUTIVE DIRECTOR
Fabio Brasi

01.4

OUR STORY

GRI 2-6



1956

Comelit - Compagnia Elettronica Italiana srl - was founded. Electronics was in its early days and Comelit started its business in San Lorenzo di Rovetta, developing its first intercom.

1977

Comelit was floated on the stock exchange. Comelit, which had grown significantly in terms of human resources, operations and management, was incorporated as a public limited company.

1980

The company became Comelit International S.p.A. The development of Comelit also continued in foreign markets. Presentation of Eurovision, the first door entry monitor made using plastic moulds. It experienced highly significant market success.

1990

Organisational and business growth resulted in the establishment of the Comelit S.p.A. group. The expansion of Comelit led to the establishment of Comelit Engineering, resulting in the development of several innovative products.

1993

Comelit obtained ISO 9001 certification.

2001-07

Comelit's expansion continued in Europe and overseas. Offices were opened in the UK, the Netherlands and Spain. Commercial expansion continued all over the world, with the opening of representative offices in strategic locations (e.g. in the United Arab Emirates and Singapore). In the meantime, Comelit obtained environmental management system certification, in line with ISO standard 14001.



1956 / The first magnetically recorded and delayed TV broadcast using the new Ampex system was the CBS programme *Douglas Edwards and the News*. *Elvis Presley* was the first album in the history of music to sell over a million copies.



1971 / The first microprocessor was built.



1981 / First launch of the Space Shuttle. Microsoft released the MS-DOS operating system.



1991 / The Internet and the World Wide Web became the first global interactive communication system.



2001 / The world was shaken by the attack on the Twin Towers in New York.



2006

The first two branches in Italy were founded: Comelit Piemonte and Comelit Sud, with the aim of increasing proximity to partners and installers. In Bergamo, the Comelit R&D company was established, to expand research and development activities.

2013

Comelit was awarded a contract for the Media Centre at the 2014 Winter Olympics in Sochi, Russia. The system was installed on the existing LAN network and served 1,512 users, while sharing numerous other services such as CCTV cameras, internet, telephone and TV.

2016

Comelit turned 60. The Comelit Group remains an outstanding Made in Italy producer, with its beating heart in the Val Seriana. It pursues futuristic projects all over the world, from New York to Singapore.

2021

Comelit changed its image. After 11 years, the company decided to refresh its branding by developing the new claim "With you. Always!". As such, Comelit intends to highlight its commitment to respecting its values and to proximity to customers.

2022

Comelit published its first Sustainability Report. Aware of the increasing attention to sustainability issues and driven by the desire to maintain constant improvement, the Comelit Group decided to embark on a journey of sustainability that resulted in the publication of the first Sustainability Report.



2007 / Steve Jobs unveiled the first iPhone.



2012 / Discovery of the Higgs boson, a particle whereby the various components of matter can interact with each other and aggregate.



2016 / Brexit referendum: "yes" wins and the UK starts to prepare to leave the EU.



2019 / Greta Thunberg launched the Fridays for Future movement.



2021 / The year of NFTs, tokens and blockchain, when the adoption of cryptocurrencies took off all over the world.

01.5

WITH YOU. ALWAYS! OUR PROMISE, OUR COMMITMENT



Eleven years later, the Comelit Group decided to refresh its branding.

The re-branding process, which involved the company's entire Board of Directors, favoured the reaffirmation of the Group's guiding values: solidity, reliability and proximity to its customers, suppliers and collaborators.

These values are fully reflected in the claim "With You. Always".

The new logo conveys the image of a robust, reliable and people-focused company.

OUR VISION FINDS CONCRETE APPLICATION THROUGH OUR UNIQUE AND DISTINCTIVE WAY OF REMAINING IN THE MARKET.

"WITH YOU. ALWAYS", OUR CLAIM, CONSISTENTLY REFLECTS OUR DAILY COMMITMENT TO OUR CUSTOMERS.



Comelit is continuing its **evolutionary path of growth** and has improved its position in the global markets in which it operates. In addition, recent acquisitions have enabled us to expand our product portfolio and enter new markets, opening up new and interesting business opportunities.

These results are strengthening the identity of the Comelit Group.

We like to think that a safer world is possible.

We pursue our vision through research and development of advanced technological solutions that can **improve the safety of people and the places where they live**, work or simply spend their free time.

Our Vision finds concrete application through our unique and distinctive way of remaining in the market. "With You. Always", our claim, consistently reflects our daily commitment to our customers

BRUNO PELLEGRINI

Marketing Director

01.6

CODE OF ETHICS

The Comelit Group has always chosen an approach that focuses its vision on people, identifying itself in attention to its collaborators and in the ethics that govern relations with suppliers and distributors and partnerships with installers.

The Comelit Group has defined the company's main purpose as improving the **quality and safety of everyday life**, always looking to the future by designing new solutions in the name of maximum **simplicity** and **functionality**. The company's objectives also include creating value and opportunities for stakeholders – such

as shareholders, customers, suppliers, employees and collaborators – and communities. To achieve these objectives, the Group has implemented all the necessary industrial and financial strategies and has developed a **Code of Ethics**, aimed at guaranteeing transparency, fairness and loyalty in every area in which it operates.

“A GROUP LIKE OURS, WHICH FOCUSES ON PEOPLE AND THEIR NEEDS THROUGHOUT ITS VALUE DELIVERY CHAIN, HAS AN ETHICAL COMMITMENT TO SUSTAINABILITY IN ITS DNA.”

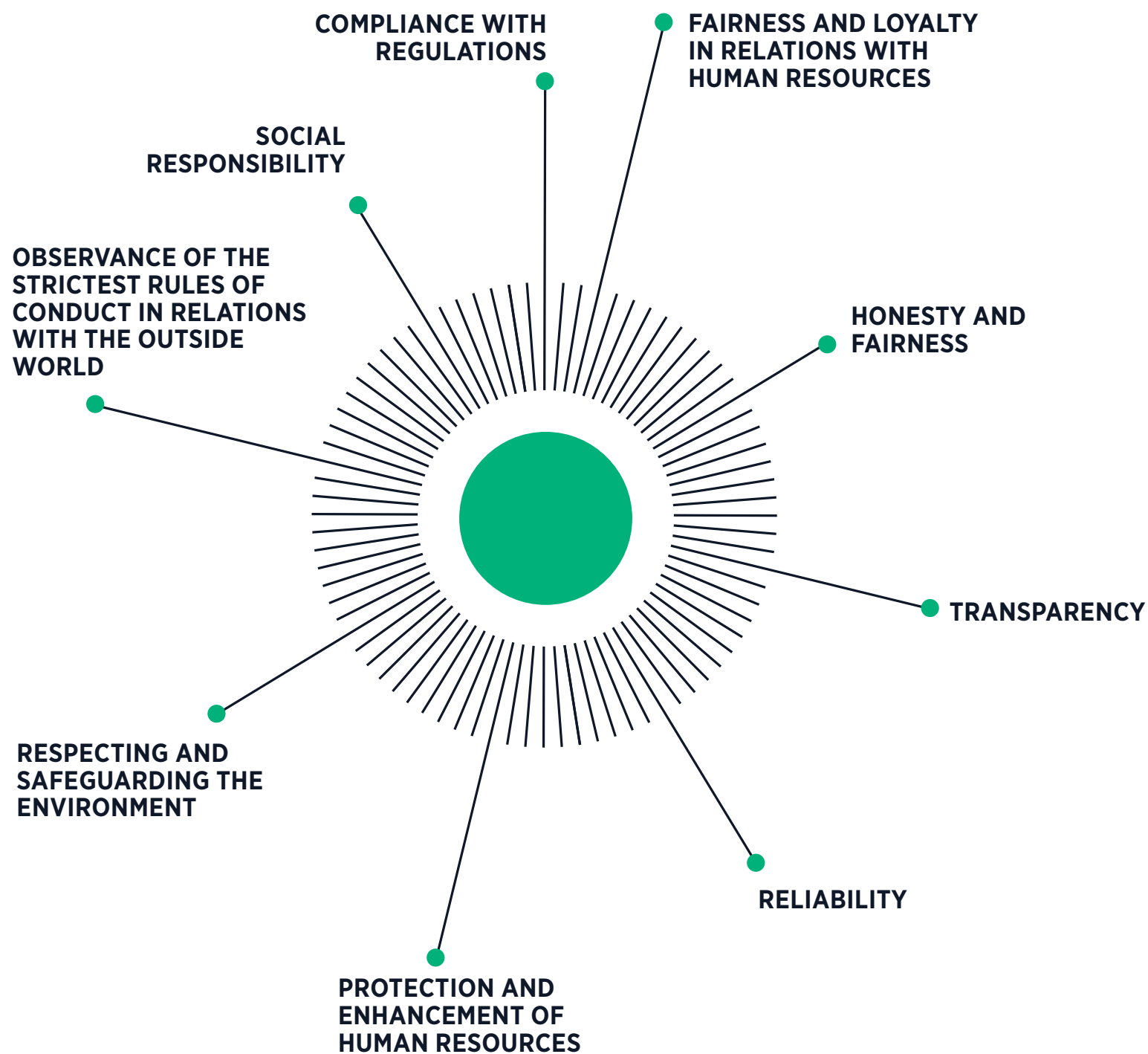
GRI 2-23

RENATO FERRARESI

Operations Director



The Code of Ethics adopted by the Comelit Group sets out the values to be complied with by all collaborators and people within the organisation as they perform their duties.



COMPLIANCE WITH REGULATIONS

The Comelit Group fully complies with all applicable laws and regulations governing its operations in the various communities and countries in which it operates.

FAIRNESS AND LOYALTY IN RELATIONS WITH HUMAN RESOURCES

The Comelit Group does business fairly and loyally; it has organisational tools to prevent the violation of the principles of legality, transparency, fairness and loyalty of its employees and collaborators, and supervises their observance and concrete implementation.

SOCIAL RESPONSIBILITY

The Comelit Group conducts its business in a socially responsible manner. All decisions and actions must be ethically validated before proceeding.

OBSERVANCE OF THE STRICTEST RULES OF CONDUCT IN RELATIONS WITH THE OUTSIDE WORLD

The Comelit Group avoids and stigmatises the use of illegitimate or otherwise improper behaviour (towards the community, public authorities, customers, workers and competitors), to achieve its economic objectives.

TRANSPARENCY

The Comelit Group provides the market and the community in general with activities in line with its business and ensures full transparency over its operations.

HONESTY AND FAIRNESS

The Comelit Group is committed to promoting loyal collaboration, which it considers functional to its own interest, as an example for all market operators, customers and stakeholders in general.

RELIABILITY

The Comelit Group is committed to pursuing excellence and competitiveness on the market, offering its customers quality services that respond efficiently to their needs.

PROTECTION AND ENHANCEMENT OF HUMAN RESOURCES

Human resources are a prerequisite for a company to exist and are a critical factor in being a successful competitor in the market. The honesty, loyalty, ability, professionalism, conscientiousness, technical preparation and dedication of staff are among the determining factors for achieving the company's objectives and represent the characteristics the company requires of its directors, employees and collaborators in various capacities.

RESPECTING AND SAFEGUARDING THE ENVIRONMENT

The Comelit Group is committed to using resources responsibly, with the aim of doing responsible business in line with the principles of sustainable development.

THE COMELIT GROUP REQUIRES ALL RECIPIENTS OF THE CODE TO AVOID ANY ACTION CONTRARY TO THESE PRINCIPLES AND TO PROMPTLY REPORT ANY KNOWN VIOLATION OF THE CODE OF ETHICS.

The Group undertakes to adopt procedures, rules or instructions to specifically ensure that the values set out in the principles of the Code of Ethics are reflected in the how the company actually does its business, and in the effective conduct of the Group, its employees and its external collaborators.

01.7

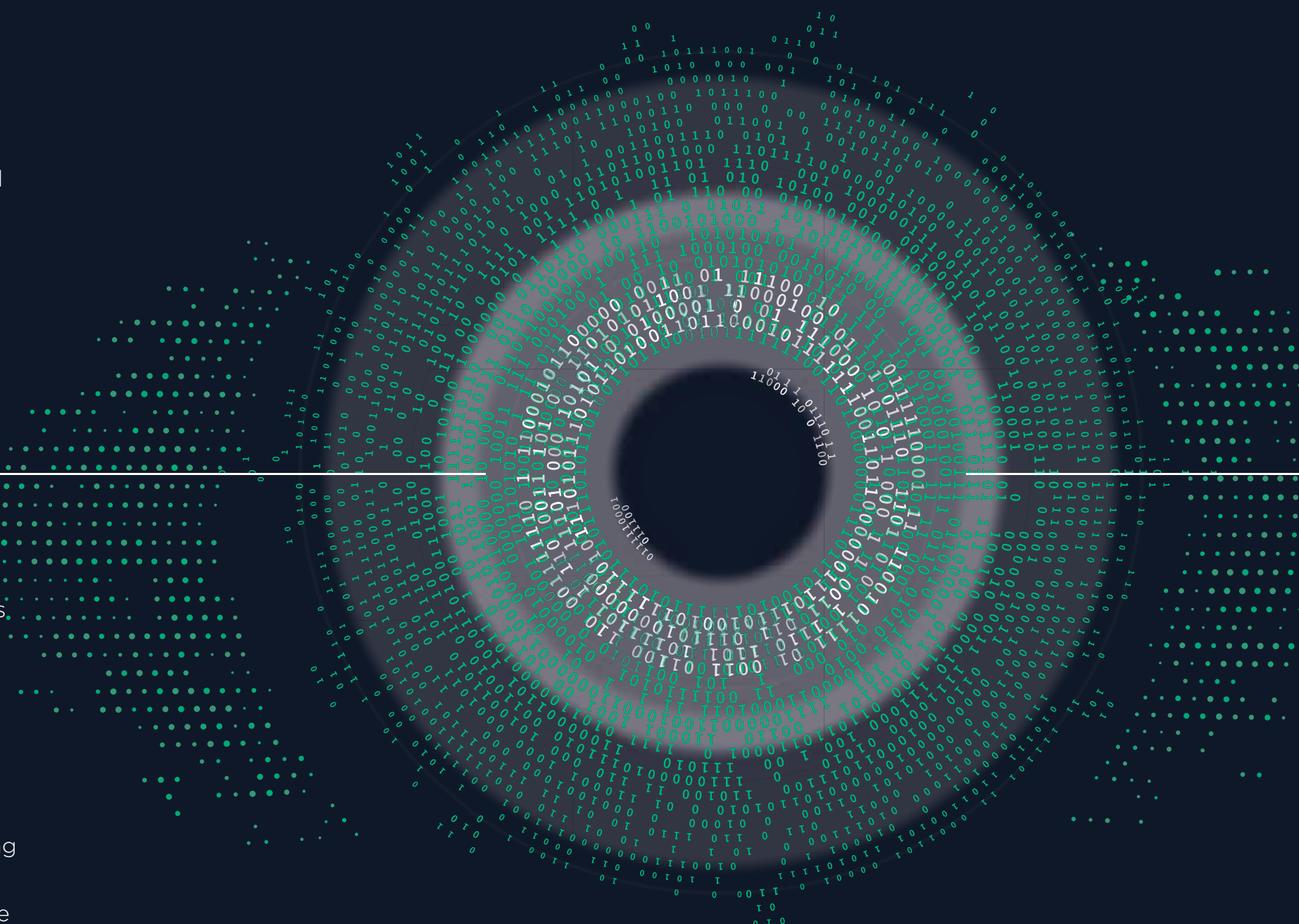
OUR VISION

We believe in a safer world.

We believe in a safer world: this is the philosophy behind our everyday operations in Italy and around the world. We think that a safer world is both a goal to aspire to and a **challenge to give everything to, without ever sparing ourselves.** We do this by designing sustainable and technologically advanced products and systems, to secure people, buildings, locations and goods. We do this with an awareness that work can also mean making mistakes, but we never give up. In this challenge,

we are not and do not feel alone: hundreds of thousands of customers around the world share these values with us and, through their work, intend to contribute to **making the world safer.**

A goal fully shared by all Comelit collaborators, whose determination, concrete work, vision and talent bring enthusiasm and energy to every workplace and, in doing so, make the world a better and safer place.





01.8

OUR MISSION

**Customer
centricity.
With You.
Always!**

Our Vision takes shape and concrete form in the Comelit Group's mission. For us, customer proximity is not only a fundamental part of the business; it represents a promise that reflects the company's values and character. Indeed, the Group has built its successful model on the principles of **proximity and closeness** to the market, to customers and more generally to all stakeholders. In a context where everyone focuses exclusively on technological evolution, Comelit chooses to emphasise the trust and reliability of a partner that intends to be there at every moment that when it matters, by positioning itself in a **"customer-centric" perspective**.

Although it allocates significant resources to the research and development of new technologies and considers technological evolution a fundamental prerequisite to remain active in the market, Comelit focuses its **strategy on the human aspect**. Since the company was founded in 1956, Comelit has always been there for its customers and has – as a result of its great deal of experience – developed an awareness that, as well as safety and technological reliability, industry professionals need to be able to count on **reliable partners** who enable them to do business efficiently, from the selection process to after-sales support.

01.9

OUR BUSINESS

Over the years, the Comelit Group has established itself as an international benchmark in the door entry monitor sector, gradually extending its range of operations to the fields of video surveillance, intrusion detection, home automation, access control and fire protection. In particular, Comelit designs the products and/or processes required for the creation of its various lines.

GRI 2-6



→ DOOR ENTRY

The Comelit Group started its business in door entry monitors, implementing **advanced technology systems**. In this sector, the Comelit Group has won **numerous prestigious international awards**, serving as a testament to the company's style and creative strength. Through its door entry monitors, the Group aims to offer not only a communication service, but also a means to shorten the distances between people.

→ VIDEO SURVEILLANCE

The Comelit Group has developed a **complete system of video surveillance solutions**, offering a range of products suitable for every need. The video surveillance market is constantly growing, with demand increasing in different segments: from residential and small commercial concerns to large-scale industry and public monitoring. In line with this evolutionary trend, the Comelit Group is committed to the continuous search for **product quality and reliability**, guaranteeing increasingly accurate and effective protection.

→ INTRUSION DETECTION

In the field of burglar alarm systems, the Comelit Group has developed a complete range, **in line with the highest international standards**, which can fulfil requirements for personal security in all contexts: from the most complex (industries, hospitals, warehouses and offices) to residential buildings and housing. The goal is **to make the end consumer feel safe, everywhere and at all times**.

→ HOME AUTOMATION

The Comelit Group has developed home automation in order to **simplify the management of all systems and technologies** installed inside homes and buildings, by making them safer and more efficient. Once again, the ultimate goal of the Group is to win people's trust, guaranteeing them maximum peace of mind regarding the safety of their homes, especially when they are far away, and **maximum comfort in their everyday lives**.

→ ACCESS CONTROL

With its many years of experience in this specific sector, the Comelit Group has broadened its range by **acquiring PAC-GDX**, a historically outstanding UK manufacturer in the field of access control based on technologies that fulfil the security and protection requirements of end customers.

→ FIRE PROTECTION

The Comelit Group is there for people, even in critical and dangerous situations. Comelit has therefore devised a series of systems that **automatically detect and alert** people to the danger of a fire, in order to **protect human lives** and **safeguard cultural and material heritage**, by initiating evacuation procedures, activating protection systems and adopting other necessary safety measures.

The quality of the results depends on the quality of the objectives and the quality of implementation. The latter is the most traditional component of quality: it relates to the issue of controlling variability and benefits greatly from the use of norms and standards.

The quality of objectives has grown in importance as the competitive dimension of quality has increased: like any competitive variable, it relies more on creativity than on standardisation. Standardisation is one of the means of co-ordinating activities in organisations.

In the quality of implementation there is, traditionally, a prevalence of the use of standardisation of processes and outputs. The consolidation of the concept of the product life cycle has led to a higher level of corporate standardisation than process (or processing) standards, the level of the subsystem that incorporates the processes that contribute to generating the good/service. This has led to the definition of the quality system, its management, quality assurance and standardisation within the company of all related activities: a fundamental step in the evolution of quality.

For proper evolution of quality, it is necessary to delve into the issue of the means and timing of assimilation of standards imported from outside, to turn them into internal norms and standards.

01.10

STANDARDS-BASED QUALITY

GRI 2-28

SYSTEM CERTIFICATIONS



UNI EN ISO 9001:2015

This is the internationally recognised standard to attest to a company's quality. The standard sets out the requirements for implementation of a quality management system within an organisation, in order to conduct business processes, improve effectiveness and efficiency in production and service delivery, and to obtain and increase customer satisfaction.



UNI EN ISO 14001:2015

The internationally recognised standard for environmental management systems. The standard covers the management of environmental aspects, taking into account environmental protection, pollution prevention and socio-economic needs.

Internal norms and standards must, by natural growth or because they take root well after transplantation, become the place of sedimentation and consolidation of company experience and knowledge. They must be conceived in a dynamic way, because they are continually enriched by internal experience and by comparison with external experiences.

Comelit has been managing and maintaining the Quality Management System for over 30 years in compliance with ISO 9001 and, for almost 20 years, the environmental management system in compliance with ISO 14001: for a company with great ambitions, these two international standards are no longer only a hallmark, but are prerequisites for access to the global market.

01.11

A GREAT ACCOLADE: GOLD MEDAL IN THE ECOVADIS RATINGS

The Comelit Group has obtained EcoVadis certification, one of the most covered awards in international sustainability ratings. For the first time this year, as a result of the improvements we have made in 2022, we receive the Gold Medal, putting us in the top 5% of companies evaluated by EcoVadis' team of international experts.

The commitment to social and environmental sustainability involves all our stakeholders: **EcoVadis is the external system we have adopted since 2019 to monitor our sustainability performance and that of our suppliers, and put forward plans to improve on respect for the environment, human rights and sustainable procurement ethics.**

Using the EcoVadis platform, Comelit assesses the risk areas in the supply chain in order to work towards continuous improvement.

Of the pillars on which the assessment by EcoVadis experts is based, the sections on Environment and Sustainable Procurement and Labour and Human Rights have contributed the most to our achievement of this highly prestigious result.



“PROMOTION AND PROTECTION OF HUMAN RIGHTS, ENVIRONMENTAL PROTECTION AND BUSINESS ETHICS ARE FUNDAMENTAL PRINCIPLES THAT HAVE ALWAYS GUIDED OUR GROUP’S POLICY. WE ARE PROUD OF THIS ACCOLADE, MADE POSSIBLE BY THE SHARING OF VALUES AND THE JOINT COMMITMENT OF EMPLOYEES AND COLLABORATORS, TOGETHER WITH REPRESENTATIVES OF OUR SUPPLY CHAIN.”

JACOPO BRAMBILLA
Regulatory Affairs Manager

01.12

SUSTAINABILITY
GOVERNANCE

Solid corporate governance is the prerequisite for the sustainable growth path we intend to undertake, in compliance with legislative provisions and market best practices.

Our Group has adopted an efficient and secure organisational and corporate governance structure, to promote transparency and clarity, and to meet the expectations and demands of a highly complex and dynamic market and legislative framework.

Our governance system is based on a traditional model, which guarantees effectiveness in management and efficiency in internal controls and promotes sound and prudent management of the business model.

Comelit is continuing on the path embarked on last year with the achievement of the objectives of the **Sustainability Plan**. The drafting of this document – the **Comelit Group's second Sustainability Report** – is the tool whereby the Group communicates the results achieved, strengthening the tasks of the **Sustainability Committee** with the **declared objective** to define the strategic guidelines aimed at integrating sustainability into Comelit's business and its everyday operations.

Specifically, the Sustainability Committee:

- **supervises sustainability issues related to business activities and their dynamics with stakeholders**, overseeing the evolution of relevant international guidelines and principles
- **formulates proposals on environmental and social strategy**, indicating and defining annual objectives and targets to be achieved and monitoring their implementation over time
- **examines and evaluates sustainability initiatives**, including in relation to individual projects
- **analyses and validates sustainability topics and proposals** for subsequent approval by the Board of Directors, including the materiality analysis for the Sustainability Report
- **supports the Board of Directors in the implementation, in terms of the Strategic Plan, of the Group's sustainability roadmap** and formulates proposals for the development of a corporate governance system for sustainable development.



02

SUSTAINABILITY AT COMELIT

Sustainability at Comelit⁴⁶
// Materiality analysis⁵⁰
// Sustainability Plan⁵⁴



02.1

SUSTAINABILITY AT COMELIT

The Comelit Group reiterates that sustainability must become a hallmark that can add value to the business and the company's operations.

Starting from the strategic guidelines identified, we involved all our corporate functions in defining a list of concrete commitments, to form the basis of the Sustainability Plan for the three-year period from 2023 to 2025.

The sustainability initiatives included in the Sustainability Plan therefore represent a roadmap that we will measure over the years using objective indicators to monitor progress towards the goals we have set.

The initiatives selected will be developed and implemented during the three-year period to which the Sustainability Plan refers.

THE COMELIT GROUP AND THE SUSTAINABLE DEVELOPMENT GOALS

At the United Nations summit in September 2015, the 2030 Agenda was ratified, setting out the 17 Sustainable Development Goals (SDGs), divided into 169 targets to be achieved by 2030.

The 17 Sustainable Development Goals aim to end poverty, fight inequality and work towards social and economic development, given the unsustainability of the current development model.

From the outset, we have committed ourselves to proactively participating in the social, climate and governance transition process. **Sustainability is a prerequisite for our actions, the core element in our strategy and forms part of our DNA.** We have therefore integrated into the Group's processes and governance all the elements of environmental protection, social and good management that contribute to creating a better future for the planet and for the community. In addition, to analyse the contribution Comelit can make to achieving the SDGs, we used the SDG Compass, a tool developed by the UN Global Compact, the World Business Council Sustainable Development and the Global Reporting Initiative for the private sector, to identify the SDGs on which organisations can have the greatest impact.

This analysis enabled us to identify the SDGs to which we can make the most significant contribution we can. We have therefore set ourselves specific objectives.

- Good health and well-being
- Quality education
- Affordable and clean energy
- Decent work and economic growth
- Responsible consumption and production
- Climate action.

A breakdown of all Comelit's objectives and commitments is set out below:



3 GOOD HEALTH AND WELL-BEING

Ensure healthy lives and promote well-being for all at all ages.

3.4 By 2030, Comelit is committed to promoting mental health and well-being by expanding welfare provision for its collaborators

3.d Comelit is committed to promoting and strengthening prevention for the reduction and management of health risks in all the Group's subsidiaries



4 QUALITY EDUCATION

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

4.2 By 2030, Comelit is committed to ensuring access to quality early child development, doubling the funding for free access to kindergarten for Group collaborators

4.3 By 2030, Comelit is committed to ensuring equal access to education for all, by establishing of scholarships for its collaborators' children

4.4 By 2030, Comelit is committed to increasing the number of hours of training per capita for all Group collaborators, to ensure that everyone has the skills required, including technically and professionally, for employment, decent work and entrepreneurial ability

4.7 By 2030, Comelit aims to double the number of training courses for its collaborators so that all employees acquire the knowledge and skills required to promote sustainable development through, for example, education on sustainable development and sustainable lifestyles, human rights, gender equality, the promotion of a culture of peace and non-violence, global citizenship and the enhancement of cultural diversity, and the contribution of culture to sustainable development

4.a Comelit is committed to promoting projects to adapt school facilities to children's needs, disabilities and gender differences, and to provide safe, non-violent, inclusive and effective learning environments for all

4.b By 2030, Comelit is committed to increasing the number of scholarships for vocational training programmes in information and communication technology and the technical, engineering and scientific fields, for its collaborators' children.

A BREAKDOWN OF ALL COMELIT'S OBJECTIVES AND COMMITMENTS IS SET OUT BELOW:



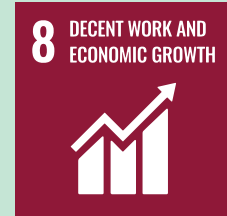
7 AFFORDABLE AND CLEAN ENERGY

Ensure access to affordable, reliable, sustainable and modern energy for all

7.2 By 2030, Comelit is committed to doubling its use of renewable energy, by installing new photovoltaic panels

7.3 By 2030, Comelit is committed to doubling the rate of improvement in its energy efficiency, by using more efficient LED technologies with lower consumption

7.a By 2030, Comelit is committed to promoting investments in energy infrastructure and clean energy technologies in all Group subsidiaries



8 DECENT WORK AND ECONOMIC GROWTH

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

8.2 Comelit is committed to achieving higher levels of economic productivity through diversification, technological updating and innovation

8.3 Comelit is committed to promoting development-oriented policies that support production activities, the creation of decent work, entrepreneurship, creativity and innovation, and to encouraging the formalisation and growth of micro, small and medium-sized enterprises

8.5 By 2030, Comelit is committed to achieving full and productive employment and decent work for everyone, including young people and persons with disabilities

8.7 Comelit is committed to taking immediate and effective measures to eliminate forced labour, to put an end to modern slavery and trafficking in human beings, and to ensure the prohibition and elimination of the worst forms of child labour

8.8 Comelit is committed to protecting labour rights and to promoting a safe and secure working environment for all workers at the Group



12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Substantially reduce waste generation through prevention, reduction, recycling and reuse

12.1 Comelit is committed to implementing specific programmes on sustainable consumption and production

12.2 Comelit is committed to pursuing sustainable management and efficient use of natural resources by 2030

12.4 By 2030, Comelit is committed to promoting the environmentally friendly management of chemicals and all waste throughout its life cycle

12.5 By 2030, Comelit is committed to substantially reducing waste generation through prevention, reduction, recycling and reuse

12.6 Comelit encourages companies in its supply chain, especially large and transnational suppliers, to adopt sustainable practices and integrate sustainability information into their regular reports



13 CLIMATE ACTION

Take urgent action to combat climate change and its impacts

13.2 Comelit is committed to integrating measures to combat climate change into its policies, strategies and development plans

13.3 Comelit is committed to improving the education, awareness and human capacity of its employees with regard to climate change in terms of mitigation, adaptation and impact reduction

To achieve these goals, we are adopting sustainable practices in all areas of our business, from waste management and reducing the use of fossil fuels to using environmentally friendly materials and reducing CO₂ emissions. We are committed to constantly monitoring and evaluating our progress and to taking corrective action to achieve these goals.

In addition, we are committed to working with our stakeholders to promote sustainable growth and create a better future for all. We are convinced that the only way we can achieve these ambitious goals and create a more

sustainable world for future generations is by working together. That's why we aim to reduce our environmental impact and promote sustainable practices throughout our supply chain. As such, we carefully select suppliers who share our values and are committed to reducing their environmental impact. In addition, we encourage our employees to be aware of the environment and to take actions that contribute to its protection.

We believe that, together, we can have a positive impact on the environment and create a better future for everyone.

02.2

MATERIALITY ANALYSIS

To understand the main factors that can affect the company's operations from a sustainability perspective, as well as the resulting current and future challenges, we developed an in-depth materiality analysis last year. By combining stakeholders' requirements and the impact generated or incurred by the company, this analysis represents the heart of the sustainability strategy to be implemented by the company over the next few years.

We have voluntarily decided to report on issues relevant to the organisation and our business, as well on the extent of our impact on the environment, the economy and society.

The standards of the Global Reporting Initiative (GRI), which constitute the methodological benchmark for the drafting of this Sustainability Report, therefore required a materiality analysis, to identify and evaluate the material topics for the Group and its stakeholders.

The aim of the materiality analysis was to identify the key factors that can affect sustainability at the company level, as well as the related challenges in the present and future. The analysis involved four stages.

Specifically, the materiality analysis identified certain "material topics", which best reflect the company's economic, social and environmental impacts and can significantly influence the

decisions of its stakeholders. These topics were then prioritised by means of a process of listening to the company and its stakeholders, and were placed within a "materiality matrix".

In carrying out the materiality analysis process, the "double materiality" framework was used as a benchmark. It identifies two directions in which to frame ESG issues: how these affect the financial performance of a company and its value over time (impacts incurred), and the company's effects on society and the surrounding environment (impacts generated).

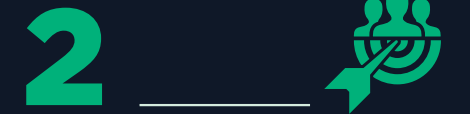
The analysis carried out therefore consisted of four main phases:

- **identification of relevant issues:** a benchmark analysis of the company's main peers and competitors of the company identifies the most relevant topics for the sector in question

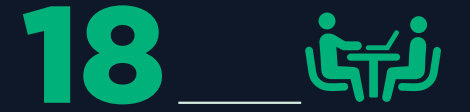
- **prioritisation of the issues identified:** the themes identified in the benchmark analysis were prioritised by means of a process of listening to the company's management, collaborators and a series of stakeholders such as customers, suppliers, representatives of bodies and institutions, the media and the community
- **definition of the materiality matrix.** After the listening process, the results were collected and reported in a matrix, constructed according to the Global Reporting Initiative standards, on two axes:
 - *the abscissa axis* shows management evaluation of impacts incurred (**financial materiality**), i.e. how sustainability issues affect the company's financial performance
 - *the ordinate axis* shows management evaluation of the impacts generated (**socio-environmental materiality**), i.e. the company's effects on society, the surrounding environment, their extent, and assessments of stakeholders' interests and expectations. In addition, to support the materiality analysis according to an impact-based evaluation logic, an organisation LCA² study was conducted, to prioritise certain issues based on the results of the analysis
- **validation of the materiality matrix,** by the CEO.

¹ The concept of double materiality was first introduced by the European Commission in the 2019 non-financial reporting guidelines. The same concept is also included in the new proposal for a Corporate Sustainability Reporting Directive from the European Financial Reporting Advisory Group (EFRAG).

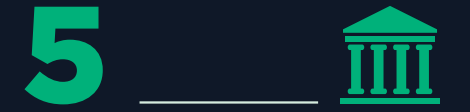
² A Life Cycle Assessment (LCA) study measures the overall environmental impacts of the organisation, including those deriving from the entire product portfolio. It is equivalent to a carbon footprint (scope 1, 2 and 3 emissions), but instead quantifies a broader set of environmental indicators, not just greenhouse gas emissions (e.g. acidification, land use and water eutrophication).



2 FOCUS GROUPS, WITH A TOTAL OF 30 COLLABORATORS' REPRESENTATIVES



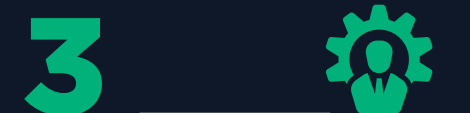
18 IN-DEPTH ONE-TO-ONE INTERVIEWS BETWEEN DIFFERENT CUSTOMER CLUSTERS



5 ONE-TO-ONE INTERVIEWS WITH BODIES AND INSTITUTIONS



2 INTERVIEWS WITH OPINION LEADERS/FOUNDATIONS/LOCAL DEVELOPMENT ASSOCIATIONS



3 IN-DEPTH ONE-TO-ONE INTERVIEWS BETWEEN DIFFERENT TYPES OF SUPPLIERS



10 INTERVIEWS WITH COMELIT MANAGEMENT



68 STAKEHOLDERS INVOLVED

GRI 2-29
GRI 3-1

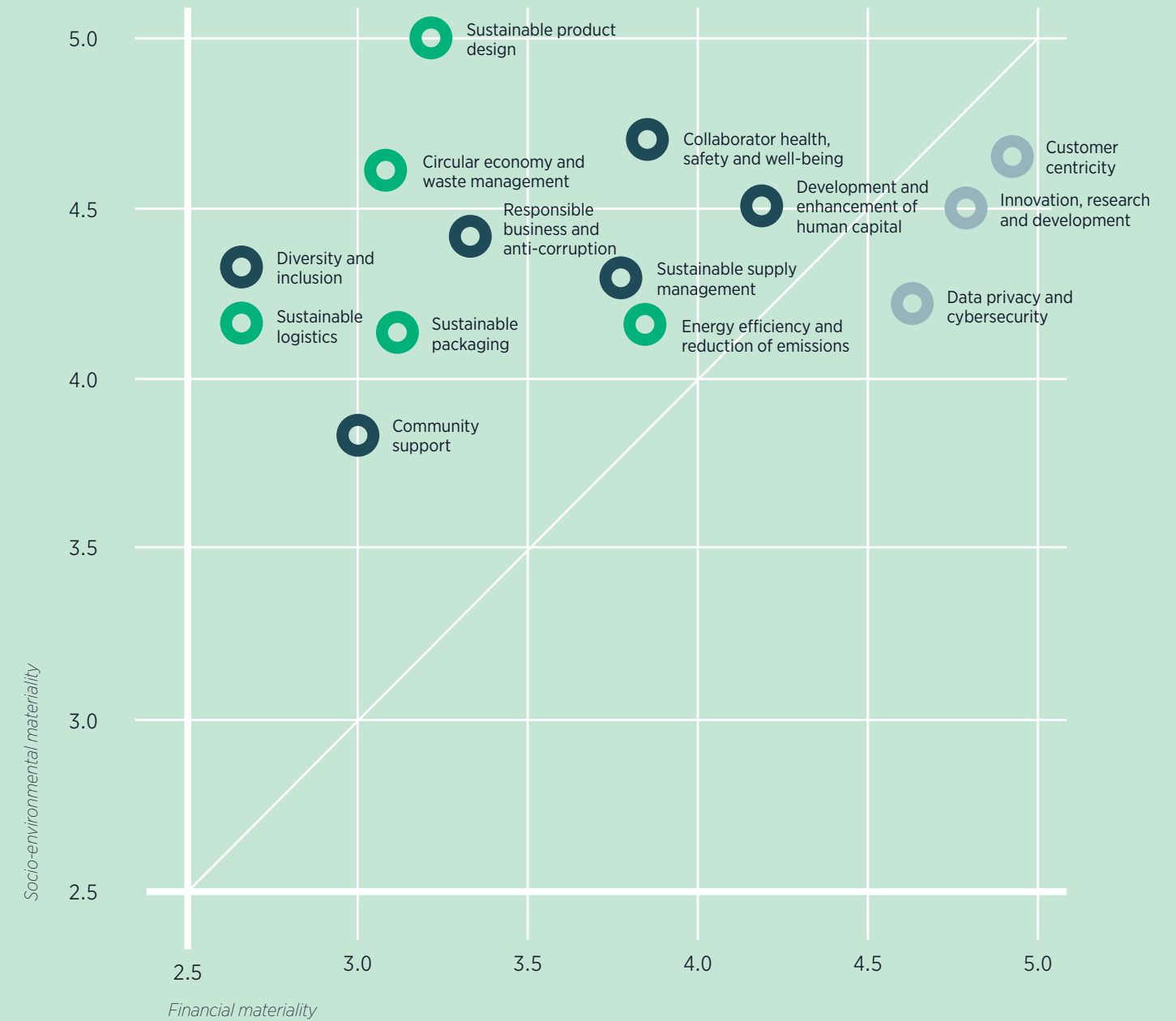
Comelit thus confirms that the material topics included in the previous report are those identified as the most significant both by Group management and by the main stakeholders.

The **14 themes** identified have been grouped into the following three **pillars**, dealt with in three different chapters of this document:

- **With You. Always:** the themes included in this pillar concern the actions with respect to human and economic resources that the company carries out to facilitate its growth and development in research, relations with customers and suppliers and the management of issues related to IT security systems and data management. The specific topics covered by the pillar are: **Innovation, research and development; Customer centricity; Data privacy and cybersecurity.**
- **People with us:** the topics included in this pillar concern the management of human capital in terms of employee training and worker well-being and safety, as well as the company's impact on the community. Together with these aspects, the issues taken into consideration related to the company's business model, such as responsible business choices and supply chain. The specific topics covered by the pillar are: **Collaborator health, safety and well-being; Development and enhancement of human capital; Diversity and inclusion; Community support; Sustainable supply management; Responsible business and anti-corruption.**

- **Comelit with the Planet:** the themes included in this pillar concern all activities aimed at promoting proper use of environmental resources, pollution prevention and waste management, energy efficiency and the adoption of practices in order to develop products that consider the environmental impact from their design onwards and in their preparation and distribution. The specific topics covered by the pillar are: **Energy efficiency and reduction of emissions; Circular economy and waste management; Sustainable product design; Sustainable packaging; Sustainable logistics.**

THE COMELIT GROUP MATERIALITY MATRIX



- With you. Always!
- People with us
- Comelit with the Planet

02.3

SUSTAINABILITY PLAN

Starting from the strategic guidelines identified, we involved our corporate functions in defining a list of concrete commitments, to form the basis of the Sustainability Plan for the three-year period from 2023 to 2025.

The sustainability initiatives included in the Sustainability Plan therefore represent a roadmap that we will measure over the years using objective indicators to monitor progress towards the goals we have set.

The initiatives selected will be developed and implemented during the three-year period to which the Sustainability Plan refers.

Some of the main lines of action are set out below, divided by category of stakeholders. These will guide the company's work over the next three years to contribute to the achievement of the Sustainable Development Goals (SDGs) set in the UN 2030 Agenda.



FOR OUR COLLABORATORS



- Launch **training courses and workshops** with the aim of increasing the culture and the entire workforce's awareness of sustainability issues (Sustainability Ambassadors)
- Gradually extend the **performance management system** to all employees, including specific drivers related to sustainability
- **Continue to set up people caring programmes**
- **Activate training and continuous learning programmes for all collaborators**
- **Implement procedures for listening and monitoring collaborator satisfaction**

FOR THE ENVIRONMENT AND FOR THE COMMUNITY



- Continue **energy efficiency initiatives** at all Group sites
- Disseminate the culture of **eco-design and environmentally aware planning** for gradual integration into product design
- Extend **the application of the LCA methodology**
- Support local bodies and associations in areas where the Group's branches operate, on **issues related to the safety of people, sites and buildings.**

FOR OUR SUPPLIERS



- Add socio-environmental variables to **the process of selection, evaluation and management of suppliers**
- Raise awareness and train buyers on issues of **sustainable procurement.**



03

WITH YOU. ALWAYS!

“With You. Always!”⁵⁸ // Innovation,
research and development⁶⁰ // Customer
centricity⁶⁴ // Data privacy and
cybersecurity⁷⁰ // IT governance⁷⁸

WITH
YOU
ALWAYS

03.1

With our customers, always. For Comelit, this isn't just a claim; it's above all our business concept.

“WITH YOU. ALWAYS!”: NOT JUST A CLAIM, BUT A PROMISE!

With the aim of always remaining close to customers, the Comelit Group implements various strategies and initiatives in its decision-making and production processes, to **provide efficient, safe, functional and innovative equipment** and to offer constant support to users of Comelit products in their everyday lives.

The strong and constant commitment to research, design and product development aims to offer customers cutting-edge products and services, in step with the times and market requirements.

Comelit implements a continuous **process of listening and measuring customer satisfaction**, through specific statistical surveys to measure and comprehend customer needs. Starting from the results obtained from this system of understanding customer requests, Comelit has developed projects to **promote communication and customer support** such as the **MyComelit app**, designed to provide constant support to installers.

Finally, on the IT security front and the responsible management of customer data, Comelit has decided to position itself as a **company that offers sophisticated products that are not only compliant with cybersecurity issues and careful use of data, but are also at the forefront of regulatory requirements**.

As a result, constant assessments and verifications of the products and technologies used are planned and the management of cybersecurity issues is expected to be centralised in a single corporate body.



03.2

INNOVATION, RESEARCH AND DEVELOPMENT

At Comelit, **innovation** and **research and development (R&D)** play a fundamental role; they keep the company as one of the main players in the market, while achieving one of its main objectives: to improve its customers' and end consumers' quality of life.

We are constantly working on the implementation of new projects, to make unrelenting progress. Over the years we have increased our investment and opened six national and international **competence centres**, to design and engineer everything we later put on the market directly at our facilities.

“THE RESEARCH AND DEVELOPMENT OF NEW PRODUCTS AND NEW SOLUTIONS HAS ALWAYS BEEN ONE OF OUR MAIN ASSETS: INDEED, COMELIT PRODUCTS ARE DESIGNED ACCORDING TO OUR CUSTOMERS’ REQUIREMENTS.”

SERGIO NICOLI
R&D Director

Our expertise encompasses a wide range of fields:

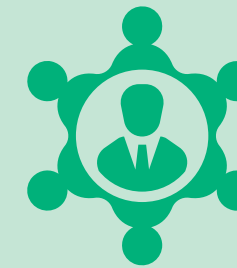
- Mobile (Android & iOS)
- Cloud (back-end and front-end)
- Hardware
- Embedded devices (Android and Linux)
- Software Desktop
- Mechanical and industrialisation
- Design Centre
- Firmware
- Cybersecurity Competence Centre

Our research and innovation work, aimed at developing new products and new technologies, is further enriched by the patents that we have received in recent years.

Since 2016, we have successfully applied for an average of two patents per year, in recognition of our intellectual and industrial value. For us, every new patent granted is a source of satisfaction and a stimulus to commit ourselves to designing other innovative solutions for the products we have in development.

INNOVATION IN FIGURES

6
PROJECT LEADERS EMPLOYED IN R&D



70 PEOPLE EMPLOYED IN GROUP R&D

16 16 UNDER-30S

16

IOT PRODUCTS/PRODUCT LINES



9%

% OF TURNOVER USED FOR RESEARCH AND DEVELOPMENT

2

NUMBER OF PATENTS GRANTED



6 R&D CENTRES

- ITALY Bergamo
- ITALY Rovetta
- UK Manchester
- FRANCE Paris
- TUNISIA Tunis
- BULGARIA Sofia

COMELIT DESIGN CENTRE

Our Design Centre is made up of a team of highly qualified internal collaborators and external professionals. **The synergy and constant cooperation between these professionals results in cross-fertilisation of ideas and sharing of knowledge, leading to the creation of innovative and cutting-edge solutions.** Communications on the products developed are always in line with the values Comelit wishes to convey. This focus on coherence and cohesion enables us to create products that meet the needs of the market and customers, while ensuring a smooth and enjoyable user experience.

1 SEARCH

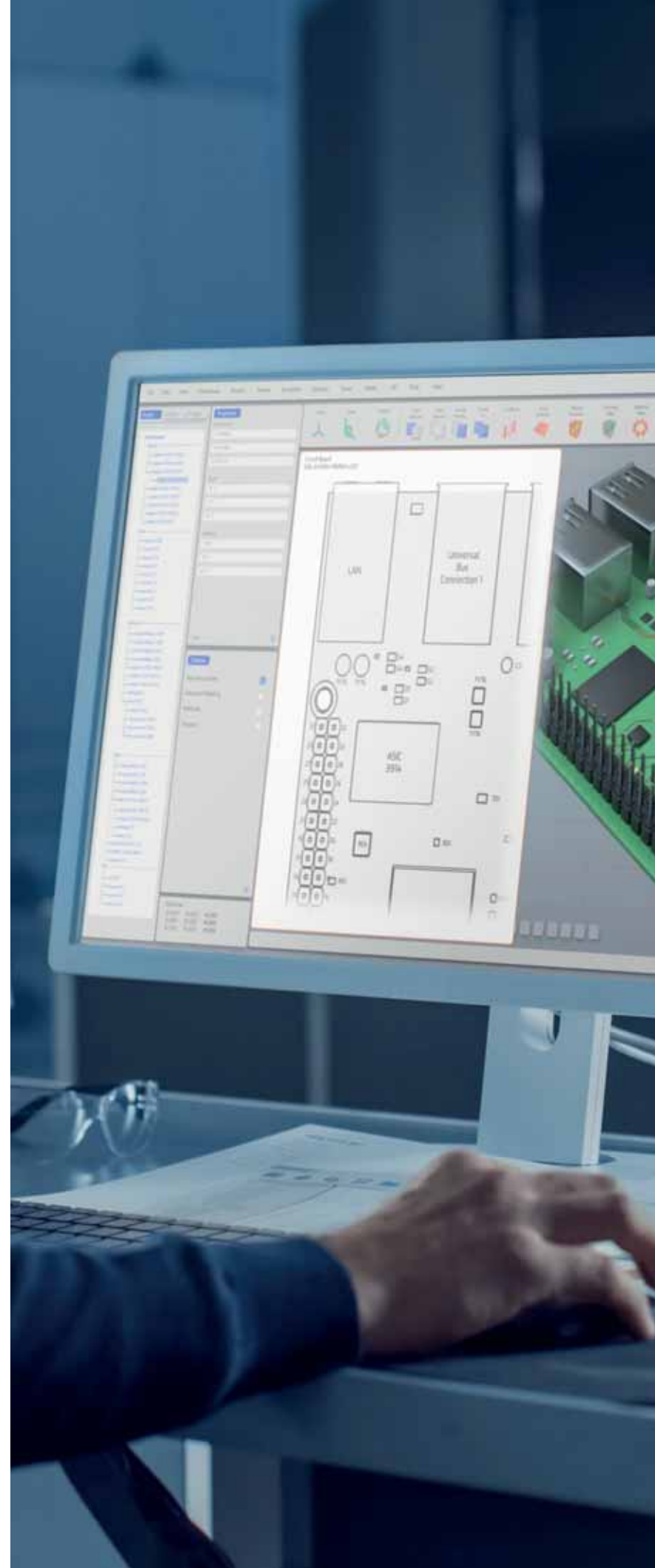
We are committed at all times to developing innovative, sustainable and at the same time customised solutions, based on the needs expressed by our customers. Continuous research ensures we always keep up with the latest trends and technologies in the field of design, guaranteeing the highest product quality and functionality.

2 DESIGN UX-UI

We create innovative and intuitive solutions that improve the experience of the users of our products. We do so by analysing our users' needs and behaviours, to identify their requirements and expectations.

3 PRODUCT DESIGN

Viewed not only from an aesthetic point of view but as an integral part of the product's functionality, product design has always been a highly recognisable factor at Comelit. A constant commitment testified to over the years by the numerous industry awards we have received.



PRESTIGIOUS AND ACCREDITED RECOGNITION IN THE FIELD OF DESIGN: COMELIT: A SYMBOL OF ITALIAN CREATIVITY

Comelit has won many prestigious international awards in the field of industrial design, making it an ambassador of Italy's reputation as a world leader in terms of creativity. From national awards such as the ADI Design Index, which rewards the best Italian design put into production every year, to broader competitions such as the US industrial Good Design Award, the German Red Dot Design and Design Plus Awards, and the Asian Merlion Award.

03.3

CUSTOMER CENTRICITY

In line with the Group's Mission, Comelit believes in a safer world. For the company, us, customer proximity is not only a fundamental part of the business; it represents a promise that reflects the Group's values and character. Indeed, the Comelit Group has built its successful model on the principles of proximity to the market, to customers and more generally to all stakeholders.

In a context where the attention is mainly focused on technological evolution, Comelit chooses to strongly emphasise the trust and reliability of a partner that intends to be there at every moment when it matters, by positioning itself in a "customer-centric" perspective.

Since the company was founded in 1956, its great deal of experience as a major player in the market has enabled Comelit to develop an awareness that, as well as safety and technological reliability, industry professionals need to be able to count on **reliable partners** who enable them to do business efficiently, from the selection process to after-sales support.

**"WE DON'T ONLY INTEND TO BE THERE IN THE PHYSICAL SENSE,
BUT ALSO AS A CONSTANT PRESENCE. SINCE 1956, WE HAVE
ALWAYS BEEN THERE AND WE WILL ALWAYS WILL BE."**

EDOARDO BARZASI

Chief Executive Officer

GRI 3-3
GRI 417-2
GRI 417-3



In 2020, Comelit therefore felt the need to **evolve its image**, starting from the **company logo** that represents the main communicator of the Group’s values, and by introducing a **new claim, “With You. Always”**, to set out the commitment the Group has made to the market. The company is also actively committed to **listening to its customers**, monitoring both their overall satisfaction with the service and contentment with action taken by the company if assistance is requested. Finally, proximity to customers is shown in the **MyComelit app**, providing the entire Comelit world in a single platform.

CUSTOMER FOCUS: LISTENING

Customer centricity is very important for Comelit because it enables us to focus on the real needs of our stakeholders.

They represent a challenge that translates into a constant commitment to developing technological solutions and services that can meet their needs.

From this perspective, the activities put in place to listen to customers offer a connection between their requirements and the design of the products and services provided by the company.

As a result, Comelit carries out constant in-depth research to assess the **overall satisfaction of our customers**. This analysis is conducted by specialist external market research and socio-

economic bodies, taking into consideration specific factors such as the extent to which customers can recommend the Group and Comelit products, as well as brand loyalty. The analysis carried out shows a **Comelit customer satisfaction index of 95**, a score that places the company in the **“optimal”** bracket of the overall satisfaction scale.

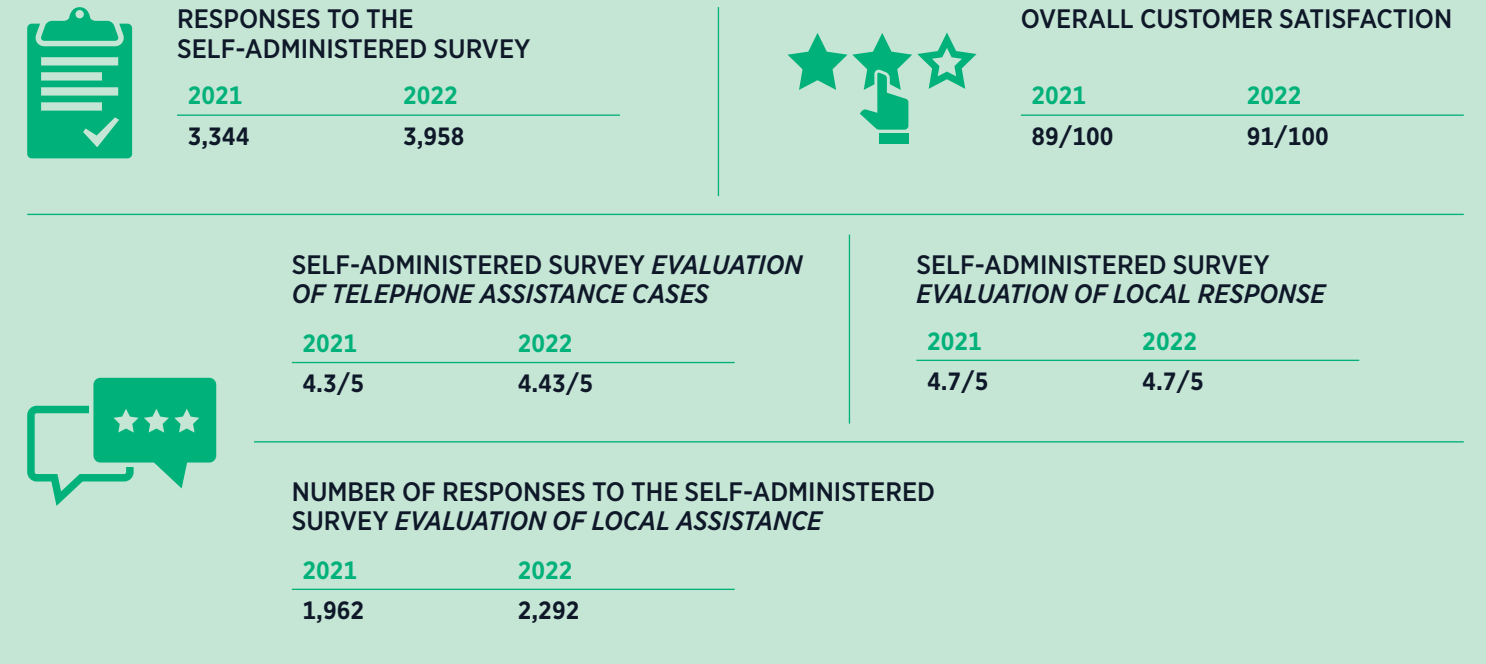
In addition, to assess customer satisfaction with after-sales support, Comelit has put in place a **self-administered survey on the completion of assistance cases**. When support and/or action is requested by Comelit, the survey is conducted when the case is closed to assess customer satisfaction with the assistance they have received. Assessments are divided into technical cases dealt with over the phone and those handled in person on site. **For both, assessments fall firmly within the ‘excellent’ range, at values of 4.6 to 4.7 out of 5, the maximum level of satisfaction.**

“BEING THERE FOR OUR CUSTOMERS, ALWAYS. LISTENING. UNDERSTANDING, THEN TAKING ACTION.”

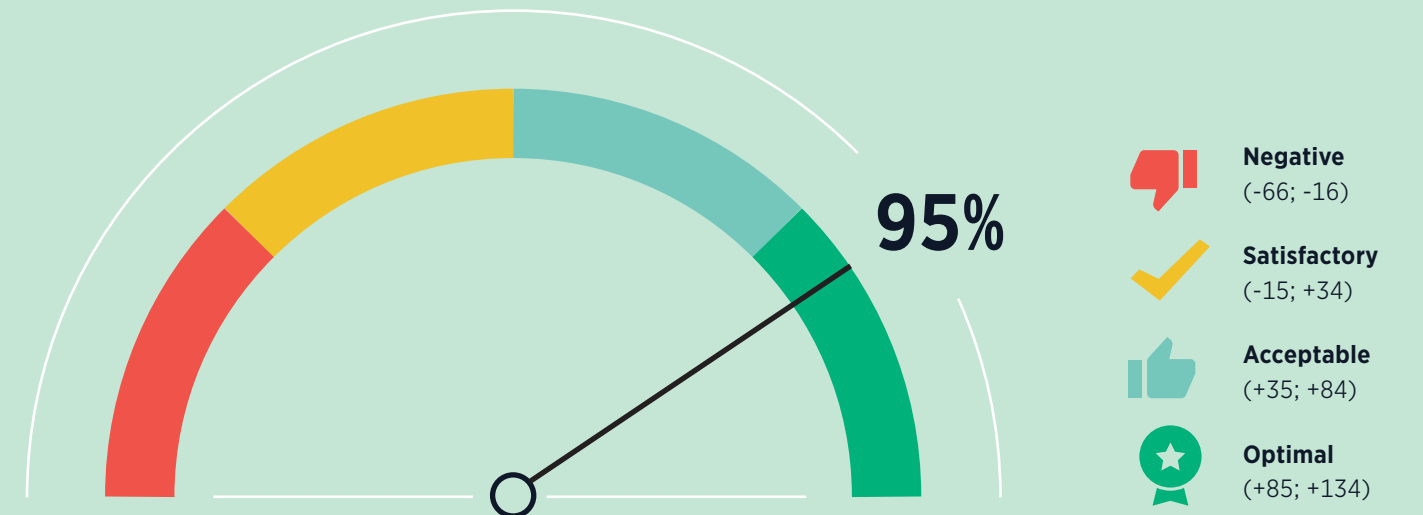
BRUNO PELLEGRINI

Marketing Director

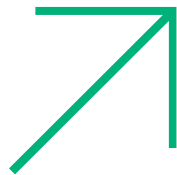
LISTENING



FM INDEX



¹Comelit Reviews | Read Customer Service Reviews of comelitgroup.com (trust-pilot.com)



WITH CUSTOMERS, ALWAYS: THE COMPANY AT YOUR FINGERTIPS

The company has launched the “Comelit 2021 Project”, partly aimed at digitalising the core values of “With You. Always”. The project has resulted in the **MyComelit app, specially designed for professionals.**

MyComelit is a **360° service that supports the installer** in their everyday work, facilitating their tasks and supporting them when they experience difficulties. Available on a smartphone and from laptops and tablets, it provides various services ranging from the choice of products to after-sales assistance, including:

- **Systems management** (remote, centralised management of door entry monitors, fire and intrusion detection, instantaneous display of system status on a visual map, option of executing commands remotely to avoid on-site intervention, system sharing with internal or external collaborators, etc.)
- **Requests for assistance**
- **Offers** (display of offers in “active” status with their offer number, description, validity period, etc.)
- **Door entry monitor configuration** (summary and list of projects in progress, option to request customised prices, etc.)
- **Active cases** (monitoring the progress of the professional’s own open cases with telephone support, etc.).

MYCOMELIT IN FIGURES

		2021	2022
Total downloads	No.	13,500	16,207
Number of support requests received via the app	No.	4,861	7,884

Staff can also view their own **contracts** (e.g. SATCO, partner agreement), installation **manuals** for the various product lines, reserved active **promotions**, and exclusive **news**.

However, the MyComelit app is only the digital side of a highly structured **customer assistance** system, which includes the work of the entire company and a **network of technicians** that are always available to the customer. In addition, to come closer to its installers, Comelit is working on a **support system for the end customer.**



COMELIT OFFICIAL: COMMUNICATION VIA SOCIAL MEDIA

As well as communicating with customers via the MyComelit app, the company also maintains a presence on the **main social networks** (Instagram, Facebook, LinkedIn, YouTube). It uses these platforms to enhance participation in **local activities, partnerships or sponsorships** in various actions and initiatives not strictly related to the business.

In this regard, it should be noted that there were no incidents in 2020 or 2022 of non-compliance concerning transparency of information on products and/or services, nor regarding advertising communications.

INCIDENTS OF NON-COMPLIANCE CONCERNING TRANSPARENCY

		2021	2022
For information on products and/or services	No.	0	0
For advertising communications	No.	0	0

0

INCIDENTS OF NON-COMPLIANCE CONCERNING TRANSPARENCY, for both information on products and/or services and advertising communications

03.4

DATA PRIVACY AND CYBERSECURITY

ARE MY DATA SAFE? ARE THESE COMPANIES TRANSPARENT?

These are just some of the questions you should ask yourself before choosing a truly valid and effective video surveillance system. Now more than ever, especially in this age of 'Big Data', cybersecurity and protecting sensitive data have become very important and topical issues that are causing growing concern among companies and private citizens.

Over the last few years, the number of cyber attacks has increased exponentially. The security of infrastructure, whether public or private, mostly revolves around video surveillance systems, and a breach of their protocols will result in severe consequences.

At Comelit, we are therefore firmly committed to find advanced solutions that can raise IT security and sensitive data protection standards. We believe that ensuring the complete safety of all data processed, every video recorded, and every face filmed should be an ethical commitment.

Data security is a priority for us and we consider ourselves responsible for such protection.

We now live in an age that can be defined as 'the age of data'.

Indeed, technological advances have made it possible for us to have virtually infinite volumes of data of different kinds and from multiple devices at our disposal. By analysing and processing these data, we can obtain information that allows us to predict both our own behaviour and that of others. Cybersecurity and the protection of sensitive data have therefore become very important and topical issues that are causing growing concern among companies and individual citizens. Unsurprisingly, since 2018, the number of global cyber attacks has risen by 81%, targeting individuals and, above all, in many cases paralysing entire financial institutions, television broadcasters, private companies, public institutions, and basic services such as post offices, airports and stations.

“AT COMELIT, WE HAVE MADE A CONSTANT COMMITMENT TO MAKING OUR SYSTEMS MORE AND MORE SECURE, WITH INCREASINGLY STRINGENT PROTOCOLS.”

MIRKO BONADEI

Chief Architect Officer



OUR COMMITMENT TO SAFEGUARD YOUR DATA

Therefore, ensuring safety and protection against cyber attacks has become the 'new normal': this is what the market demands. That's why Comelit is committed to developing and adopting increasingly effective countermeasures that involve introducing sophisticated firmware, shields and protocols in order to raise our standards when it comes to cybersecurity.

However, if we really want to talk about the security of all our data and video feeds, whether as individuals and citizens or consumers, there is one question that needs to be answered clearly and transparently: can a manufacturer truly guarantee reliability and security?

As we all know, a number of countries worldwide have banned several video surveillance system manufacturers from their markets. One of these countries is the USA, where the federal NDAA in 2018 prohibited federal agencies and their contractors from using and purchasing telecommunications and video surveillance equipment and components made by leading global manufacturers, including brands that are very well-known even in Italy.

This is a critical issue that **does not, however, affect us at Comelit in any way**. On the contrary, we are a private, non-state-owned company. **We have no obligations to anyone**, other than to our shareholders. As a result, we have **no interest in or obligation to share the data** flowing through our servers.

But that's not all. Although it is clear by now that virtually all video surveillance technology is 'made in China' – as is the smartphone we carry in our pocket or the PC on our desk, we can guarantee that our systems feature components that are not **on any country's blacklist**.

In addition, our server-cloud infrastructure for data transfer and storage is based in Europe, **owned by us** and operated in **partnership with the world's largest cloud provider, Amazon AWS**, which has a 36% market share.

Our servers in Frankfurt, Germany, are protected by state-of-the-art cybersecurity systems, and not only are they not accessible to anyone for any reason whatsoever, but they are also continuously backed up. For us at Comelit, the ability to ensure your data and videos are always completely safe is not only **a source of pride but also an ethical commitment**. Such a guarantee should not be an optional requirement, but an inviolable right for everyone.

SAFE PRODUCTS. OUR COMMITMENT, YOUR SAFETY

At Comelit, cybersecurity is a **priority**: we put a lot of effort into making our systems more and more secure by adopting increasingly stringent protocols.

To do so, we have **invested resources and talent**, and taken several steps to implement the best possible solution: First of all, we have **imposed limitations on operations carried out by third parties** – product suppliers – by requiring higher standards than those normally applied.

We then created a **new platform**, Comelit Cloud,

located in Europe, in Frankfurt, with extremely secure protocols and implemented multi-regional back-up and disaster recovery systems, as the **redundancy** of the systems enables us to maintain data availability, even when unforeseen events occur.

We have started **monitoring activities** on the platform, using **artificial intelligence systems that monitor access and account activity on the platform, which can not only detect not only intrusions, i.e. attempted unauthorised access, but also behaviour not in line with individual account authorisations. This means that if someone were to use an** authorised account for transactions not normally seen on this type of account, i.e. out-of-pattern transactions, the event would be detected and reported. Not only are operators/accounts constantly monitored, but the infrastructure itself also regularly undergoes **vulnerability tests** to check whether adequate **security** is in place to deal with new potential threats.

The three principles of cybersecurity are:

- **Confidentiality**: access to data must only be provided to users with genuine authorisation
- **Integrity**: data must be stored without any tampering
- **Availability**: data must be accessible and available in the shortest possible time

OUR CLOUD CCTV SERVICE: NOW SAFER THAN EVER

The trust of our customers forms the base of Comelit's business and we know that you trust us to protect your most critical and sensitive resource: your data. Our cameras and video recorders use special firmware to ensure the utmost care when it comes to cybersecurity and data protection. Comelit products use encrypted communication protocols, Telnet port locking, encrypted configuration files, storage data encryption and backup.

But is this enough to ensure cybersecurity and data protection? We have pushed ourselves further. We have further increased the security of our customers' data using the infrastructure and cloud services of Amazon Web Services (AWS), the most comprehensive and secure cloud platform currently available.

Thanks to the use of AWS cloud services, Comelit video surveillance solutions offer the highest standards in terms of resilience, cybersecurity and the protection of sensitive and personal data in compliance with European privacy regulations. The infrastructure, based on the use of highly reliable and scalable serverless technologies, is systematically subject to:

- **Vulnerability Assessment** for the detection of security holes in software, its dependencies, and network configurations
- **Monitoring** with **artificial intelligence** tools that use pattern recognition algorithms to detect fraudulent behaviour and attacks
- **Monitoring** with tools that use **machine learning** and pattern matching to identify sensitive data and protect its privacy and security by enforcing security best practices
- **Intelligent threat detection tool** with transport layer DDoS attack protection (ISO OSI level 4).

DOCUMENTED COMPLAINTS ON PRIVACY BREACHES AND LOSS OF CUSTOMER DATA

		2020	2021	2022
Total documented complaints received on customer privacy breaches	No.	0	0	0
<i>from third parties, documented by the organisation</i>	No.	0	0	0
<i>from regulatory bodies</i>	No.	0	0	0
Total documented events of loss and/or theft of customer data	No.	0	0	0

GRI 418-1



INFORMATION SECURITY CREATION OF THE COMPETENCE CENTRE

Due to the increasing computerisation of services and the resulting increase in the number of attacks, cybersecurity is becoming an increasingly sensitive topic from a regulatory point of view.

Therefore, **we want to ensure responsible use of our customers' and stakeholders' data, in compliance with the regulatory standards and the latest and most advanced security protocols.**

That's why we have drafted various reference documents and policies for data management and cybersecurity processes, as well as for the management of IT security incidents:

- cybersecurity policy
- Cyber Incident Management policy
- Change Management policy
- BUSINESS CONTINUITY plan
- Data Breach reporting procedure
- Backup and Restore operating procedure
- cybersecurity policy inspired by ISO 27001.



At Comelit, we consider the protection of personal data to be a strategic element and an essential principle for our business, as it is a fundamental factor in strengthening customers' trust and sense of security.

WITH THE AIM OF MAKING OUR COMMITMENT MORE AND MORE CONCRETE AND STRUCTURAL, WE HAVE PROVIDED TRAINING COURSES TO DISSEMINATE A CULTURE RELATED TO IT SECURITY AND THE PROCESSING OF PERSONAL DATA, WITH THE AIM OF INCREASING AWARENESS OF THE RISKS AND POTENTIAL THREATS IN THIS AREA.

The Comelit Group has therefore decided to **centralise issues relating to the management of cybersecurity issues in a single body**, dedicated to the culture of safety and the growth of skills on the subject: the competence centre, fully supported by all the company functions with interdisciplinary involvement.

The Competence Centre was created with the aim of improving the procedures in place for the safety of products, systems, and services. Its main tasks are:

- to harmonise cybersecurity and data security across the Group
- to offer support in the design of devices, cloud, app, web portal
Secure by Design
- to organise training courses
- to monitor technological developments
- to support commercial functions.





Specifically, during 2022, 80 hours of IT security training were provided with 120 Group employees participating, as well as 220 hours of privacy protection training for all Group employees.

The training objective of the courses is aimed at increasing staff awareness of the different attack techniques and countering them using the cybersecurity skills learned.

We have also adopted security measures aimed at reducing the level of IT risk by strengthening the complexity of corporate credentials and introducing Multi-Factor Authentication for all Group employees.

Further activities to improve IT security safeguards include:

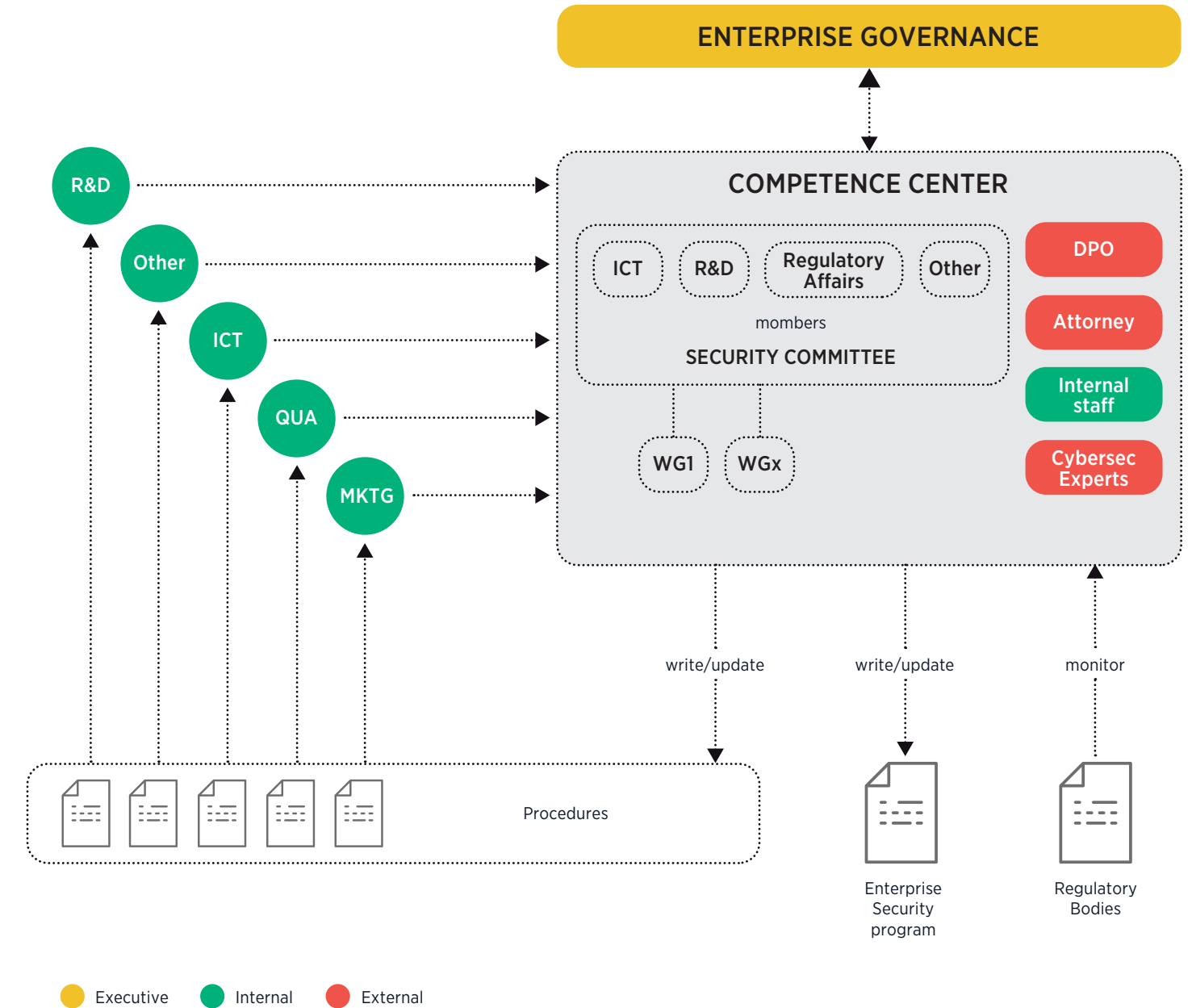
- strengthening network security measures (SOC)
- in the extension of security tests, activities aimed at identifying any vulnerabilities and remedying them
- simulation of phishing and ransomware campaigns to raise awareness of resources on the risks related to this type of threat.

We have also drafted and published an IT Regulation, aimed at providing practical advice to our employees to prevent and manage the main cyber threats and provide useful tips to defend themselves against cybercrime. Recommendations include, for example, the use of strong passwords, online shopping, phishing, spamming, and the use of mobile devices.

In addition, the IT security incident management process ensures timely management of anomalous events that may have an impact on our Group's ICT assets and services. This process allows anomalous events to be recognised and managed by the relevant structures.

The ICT Organisational Unit manages these events in collaboration with any other organisational units involved, depending on the entity and type of the event itself.

By virtue of the principle of accountability, the Privacy & Data Protection function, in collaboration with the other Organisational Units concerned, draws up and maintains a Breach Register to documenting any personal data breach.



IT GOVERNANCE

Comelit is a business whose mission is to design new technological solutions for door entry monitors, video surveillance, intrusion detection, home automation, access control and fire protection. Its recent history is also made up of important acquisitions that have contributed to the company's further growth and expansion, triggering new organisational and IT challenges: the more complex the business becomes, the more IT technologies are needed for support and for increasingly digitalised enabling processes.

Faced with the challenges that arise with an ever-expanding business like ours, the needs related to proper use of data also change, as well as the objectives.

We are now looking at analytics with a further impetus of innovation: for example, no longer only for reporting based on historical data, but also to improve decision-making processes (and the decisions themselves) through simulations and predictive analysis, exploiting the full potential of the cloud, machine learning and artificial intelligence. It is a modernisation that has followed the natural evolution of the business.



“THE MORE COMPLEX THE BUSINESS BECOMES, THE MORE IT (AND ANALYTICS) MUST TRANSFORM, MODERNISE, EVOLVE TO DELIVER VALUE AND EFFECTIVE RESULTS.”

RENATO FERRARESI

Operations Director



EVERYTHING RELATED TO DATA GOVERNANCE (SOURCES, PREPARATION, QUALITY, AVAILABILITY OF DATA IN DIFFERENT INFORMATION SYSTEMS, INCLUDING ANALYTICS) IS THE DOMAIN OF IT. AND IT IS ESSENTIAL THAT THIS IS THE CASE, BY VIRTUE OF THE EMPHASIS ABOVE: THE COMPANY IS CONSTANTLY GROWING AND EXPANDING, AND WITH IT GROW THE ASSOCIATED DATA AND COMPLEXITY ASSOCIATED WITH IT; TO ENSURE ALL MANAGEMENT HAVE CLEAR AND CONSISTENT DATA, IT IS ESSENTIAL THAT THERE IS STRICT CONTROL AND GOVERNANCE BY IT.

In line with the transformation we are undergoing, however, we are starting to expand the pool of users who can take advantage of the analytics capabilities of the SAS platform independently (without prejudice to the rigour of 'behind the scenes' IT, which must maintain control over data quality). A governed autonomy, in short.

All this, once again, to make more conscious, more objective decisions and more effectively guide the continuous path of innovation that forms part of this company's DNA, which must be supported by IT as best as possible, through the correct technological choices.



04

PEOPLE WITH US

“People with us”⁸² // Development and enhancement of human capital⁸⁶ // Collaborator health, safety and well-being⁹⁶ // Diversity and inclusion¹⁰² // Community support¹⁰⁶ // Sustainable supply management¹⁰⁸ // Responsible business and anti-corruption¹¹²



04.1

“WITH YOU. ALWAYS”: COMELIT AND RESPONSIBILITY TO PEOPLE

With our
collaborators,
always. Proximity
is the basis for
the process of
growth.

One of the drivers that has always characterised the Comelit Group is **its focus on people and paying attention to customer and staff needs**. This clear guiding principle ensures we are always focused on our business model, consistent with the company's values and identity, attentive to technological innovation and the constant search for excellence in customer service, a prerequisite for achieving consistently positive economic results with a view to the long term and sustainability.

The Comelit Group believes in everyone's contribution to the success of business initiatives, an expression of the ideas and work of all its collaborators, considering the constant enhancement of the human factor as a basic element for the solidity and growth of a company. The centrality of the Group's people is also achieved through the full protection of workers' rights, the enhancement of staff through the promotion of training and merit, the introduction and consolidation of numerous innovative contractual instruments, the development of an effective corporate welfare system and a better work-life balance.

“THE CENTRALITY, INVOLVEMENT AND ACTIVE PARTICIPATION OF THE HUMAN FACTOR IN BUSINESS PROCESSES ARE FUNDAMENTAL OBJECTIVES OF THE TOOLS FOR MANAGING AND DEVELOPING ORGANISATIONAL BEHAVIOUR. AS REPORTED IN THE GROUP'S CODE OF ETHICS, THE FUNDAMENTAL AND IRREPLACEABLE POINTS OF THE COMPANY'S COMPETITIVENESS INCLUDE THE COMMITMENT TO BRINGING OUT PEOPLE'S BEST PROFESSIONAL SKILLS, ACTIVE PARTICIPATION OF RESOURCES IN THE PROCESSES IN WHICH THEY ARE INVOLVED AND THE FACILITATION OF THE INTERNAL COMMUNICATIONS SYSTEM THAT PROMOTES THE CULTURE OF LISTENING AND THE CIRCULATION OF INFORMATION. THE SEARCH FOR HUMAN RESOURCES ORIENTED TOWARDS EXCELLENCE IN PROFESSIONALISM, FLEXIBILITY AND HIGH MOTIVATION IS CARRIED OUT IN FULL ADHERENCE WITH THE PRINCIPLES OF RESPECT AND EQUALITY.”

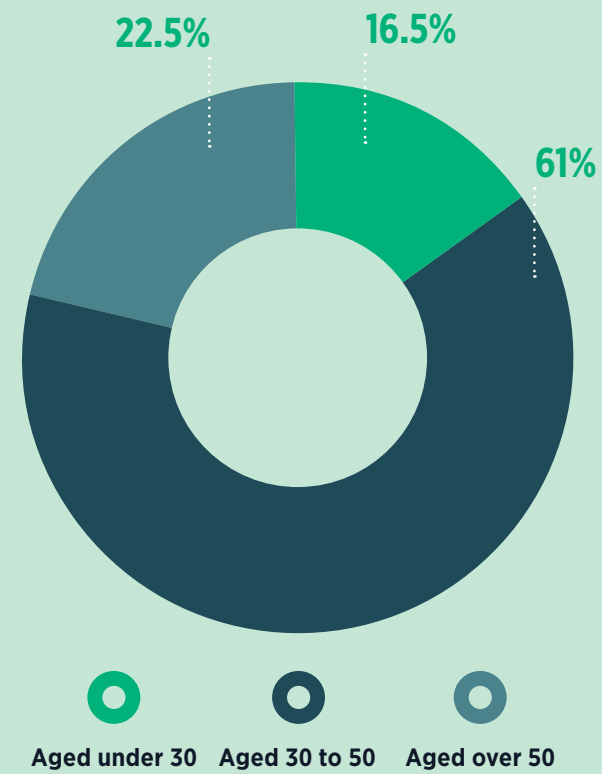
SILVIA BRASI

President

As at 31 December 2022, the Comelit Group had 928 employees (+7% year-on-year), consisting of 671 men and 257 women. Almost all Comelit employees are on permanent contracts (97%).

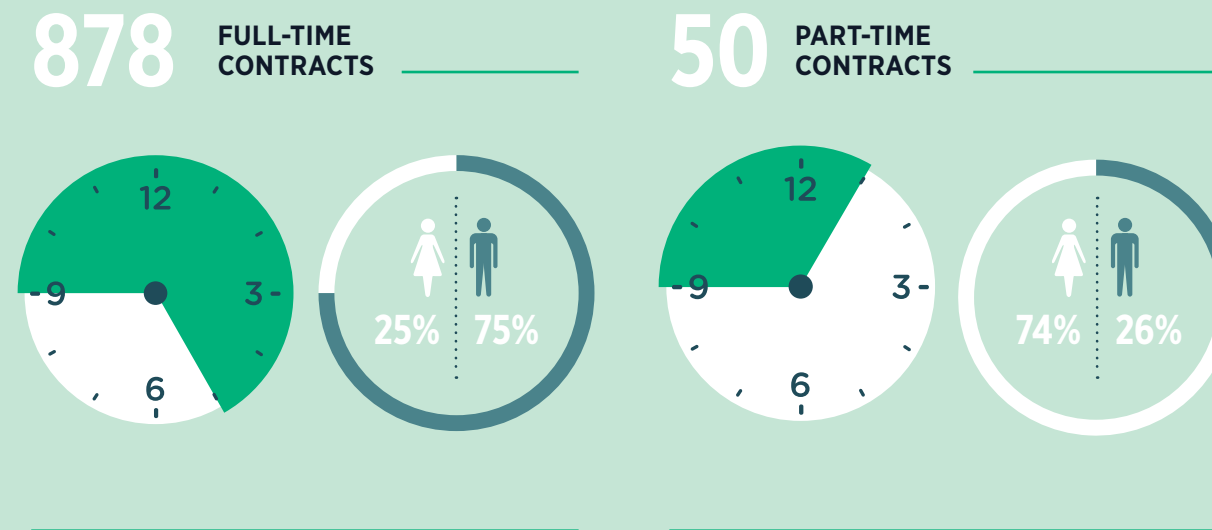
TOTAL WORKFORCE

	2020	2021	2022
Total workforce	No. 794	869	928
→ Men	No. 598	632	671
→ Women	No. 196	237	257
→ Aged under 30	No. 117	135	154
→ Aged 30 to 50	No. 520	552	565
→ Aged over 50	No. 157	182	209



TOTAL EMPLOYEES BY TYPE OF CONTRACT

	2020	2021	2022
Total employees by type of contract	No. 794	869	928
→ Full-time (total)	No. 759	830	878
Men	No. 590	622	658
%	78%	75%	75%
Women	No. 169	208	220
%	22%	25%	25%
→ Part-time (total)	No. 35	39	50
Men	No. 8	10	13
%	23%	26%	26%
Women	No. 27	29	37
%	77%	74%	74%



04.2

DEVELOPMENT AND ENHANCEMENT OF HUMAN CAPITAL

The Comelit Group has always focused on the customer and on human relations: a company of people, for people. "Human capital" is actually the organisation's main asset and represents a wealth of knowledge, skills, ways of working and expertise.

It is thanks to the professional skills, availability, sensitivity and ability to generate trust among its staff that the Group can count on solid relationships with local areas and can focus on the development and innovation of the products and services offered. As people are the engine of growth and evolution, it is a strategic prerogative of the Group to safeguard their well-being and promote their professional growth.

The development of human capital is increasingly emerging as a permanent path throughout people's careers, which therefore requires differentiated and balanced training for the whole of their life. The training system is based on the personal characteristics of each individual, but can be enhanced through multiple forms of learning, becoming a strategic lever for the growth of the potential of resources and a diffuser of innovation and development. Training activities must meet the need to ensure that staff possess adequate levels of knowledge and skills to fulfil their professional duties, including in line with the main regulations in the sector and the high standard of service provided by the Group.

GRI 3-3

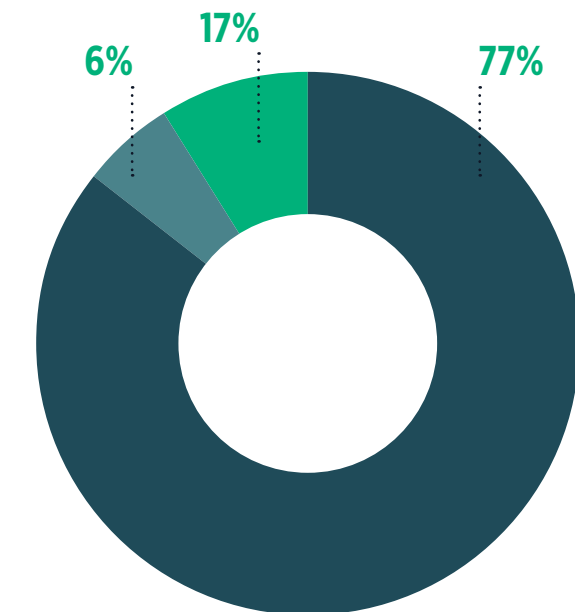
IT IS A STRATEGIC PREROGATIVE OF THE GROUP TO SAFEGUARD PEOPLE'S WELL-BEING AND PROMOTE THEIR PROFESSIONAL GROWTH. THE DEVELOPMENT OF HUMAN CAPITAL IS INCREASINGLY EMERGING AS A PERMANENT PATH THROUGHOUT PEOPLE'S CAREERS.

With a view to ensuring opportunities for personal and professional growth of resources, making it possible to move from one role to another in the same organisation and meeting the requirements to cover them and to accelerate the processes of entry of new hires into the world of work as a result of knowledge and skills ensured by the training system, the "Training" project continues. Begun in 2021, it aims to accompany colleagues in the processes of qualification, retraining and internal mobility (skilling, upskilling and reskilling), increasing the person's expertise in a changing working world that is taking on different forms.

Through a methodology that makes it possible to map and develop the skills of human capital, people are accompanied on skills development paths with the aim of bringing out results, talent and skills. "Focus on people", attention on empowerment and motivation: these are the levers to enhance distinctive professional skills, identify those to be improved and learn new ones, in a context of "life-long learning", aimed at putting everyone in a position to carry out their work more effectively and efficiently.

9,366 TRAINING HOURS DELIVERED

- Managers
- Executives
- Employees



GRI 404-1
GRI 404-2

As part of continuing education and job rotation, we are pursuing a training pathway aimed at:

- personal growth and an increase in business knowledge
- understanding of the rationale behind the assignment of skills
- making resources more and more proactive and responsible in the personal applications they submit.

Every year, we hold the **Performance Review, a system for evaluating the performance of our employees**. The system is an integral part of a more general process of management and development of human resources, aimed at stimulating and supporting professional and personal growth. The assessment, carried out annually, aims to enhance the talent, skills and uniqueness of our people, with the aim of promoting a culture of listening and good feedback management. The evaluation process, which involves everyone, is divided into the following main phases:

- Annual report and performance evaluation by both the manager and employee (self-assessment), to prepare for the feedback meeting
- Sharing and discussion in person between manager and collaborator during a Development Interview, when each person's Individual Development Plan is decided
- People Review of each function with Human Resources, to identify interventions and actions to support the growth and development of people.

TRAINING

Our commitment to people starts with people, with our collaborators: **the goal is to look at the person as a whole, considering both the human and professional aspects**. Through a properly developed training plan, we intend to ensure the provision of specific training modules aimed at developing the skills necessary for the professional context in which our collaborators work. Along these training pathways, the focus is oriented not only to individual growth, but to the collective dimension of learning new knowledge and skills, aiming at training programmes that ensure everyone can feel represented in the community and make their own contribution to its development.

Training on health and safety in the workplace is **mandatory**. The modules are delivered in person for safety officers and online on an **e-learning platform**

- action form delivered through an *e-learning* platform on **specific topics related to the technical aspects of the products in the catalogue**
- training on the **protection of privacy**, through training modules delivered in-house.

THROUGH A PROPERLY DEVELOPED TRAINING PLAN, WE INTEND TO ENSURE THE PROVISION OF SPECIFIC TRAINING MODULES AIMED AT DEVELOPING THE SKILLS NECESSARY FOR THE PROFESSIONAL CONTEXT IN WHICH OUR COLLABORATORS WORK



In addition to the mandatory training, we have provided specific **courses**, identified over the year by the Human Resources Management Office and the heads of the Operating Units on the basis of the skills required by structural and regulatory developments in the electronics sector

In 2022, a training plan was developed for the acquisition of **soft skills** and **interdisciplinary expertise**. Among the many topics covered were innovation, leadership development, and the future of marketing and communication.

TRAINING ACADEMY

Comelit Training Academy is the initiative created by Comelit for **training, refresher courses and constant development to training and refresher courses created by the company, aimed at the constant development of the professional culture within the electrical installation sector.**

The opportunities for growth offered by the Comelit Training Academy are intended for both installers and architects, designers and construction industry professionals. The essential factor in the courses, seminars and other activities at the Comelit Training Academy is knowing how to combine theory and practice, which expands the student's professional and technical know-how and ability to consult with the client, in the interest of increased competitiveness.

The provision at the Comelit Training Academy combines distinct training and work components with moments of fun involvement and leisure, implemented in a way that does not interfere with the smooth running of the courses, which not only make participation even more gratifying, but also become opportunities for dialogue and knowledge sharing among the participants.

Comelit's experience emerges from the breadth and quality of the topics covered, which make the Comelit Training Academy courses useful, tangible benchmarks with synergistic topics; they therefore offer professional information that can be 'used' immediately in the workplace. The activities pursue these objectives:

- to gain specialist knowledge on home automation, door entry monitors, intrusion detection, video surveillance and fire protection
- to provide the most useful theoretical and practical teaching on Comelit systems
- to raise awareness of all the applications of Comelit systems, and to encourage independent management of system design and installation
- to ensure confident mastery of the design and installation of Comelit home automation systems, a professional skill increasingly in demand on the market and therefore a real source of income
- to adopt technological, plant and home automation solutions to optimise energy savings
- to acquire full mastery of the most up-to-date installation and design techniques
- to show how new technologies can add value to property and buildings
- to develop skills, including at a commercial level, to improve dialogue with customers not only from a technical point of view, but also in budgeting, in the presentation of projects, and in the negotiation and completion of contracts.



At Comelit, training is a priority, because it involves two of the company's pillars: people and skills.

TRAINING, A PRIORITY FOR COMELIT: THE ACADEMY KICKS OFF

The numbers of training sessions provided are genuinely significant, reaching 9,000 hours in 2022, focusing on the issues of delegation and responsibility. This has led to excellent results in terms of the effectiveness of hybrid teams and a high level of engagement.

Hence the decision to design and set up a fully fledged Comelit Academy which, in addition to managing all the training activities aimed at employees, ranging from more traditional training to e-learning and self-learning, will also act as a benchmark for all the training **Comelit** regularly provides externally, especially to customers or partners.

It is worth mentioning the **participatory way** in which the training courses are designed: the training covers both technical skills and soft skills and many courses are decided on by employees with their manager as part of an individual development plan that encourages the joint construction of everyone's pathways of growth.

Training is also part of Comelit's approach and selection process: we have a privileged relationship with young students, from both high schools and universities. We offer training internships throughout the year, to give young people the opportunity to approach work, we host school visits and we always aim to feature strongly at school events and Career Days.

To cultivate the knowledge and skills of its people, in 2022 the Comelit Group provided **9,366 hours of training**, a clear increase year-on-year.



“IN FACT, ONGOING GROWTH AND DEVELOPMENT FOR OUR PEOPLE, AS WELL AS THEIR WELL-BEING, IS A STRATEGIC LEVER TO ACHIEVE THE CORPORATE GOALS. FIRMLY OVERSEEING THE ACQUISITION PROCESSES, MAINTAINING AND RENEWING DISTINCTIVE KNOWLEDGE AND SKILLS, IN A MANNER CONSISTENT WITH THE COMPANY'S VISION, VALUES AND CULTURE IS ONE OF THE PRIORITY OBJECTIVES TO STRIVE FOR, TO ENSURE THAT EMPLOYEES MAXIMISE THEIR POTENTIAL AND THAT THE COMPANY GROWS CONTINUOUSLY AND SUSTAINABLY. THIS TRANSLATES INTO CONSTANT PLANNING OF TRAINING COURSES AIMED AT SUPPORTING EVERYONE BOTH IN TERMS OF THE IMPLEMENTATION OF TECHNICAL AND SPECIALIST SKILLS, AND IN THE DEVELOPMENT OF INTERDISCIPLINARY AND MANAGERIAL SKILLS, STARTING FROM WHEN THEY INITIALLY JOIN THE COMPANY AND CONTINUING THROUGHOUT THEIR CAREER.”

JOLANDA BERNARDI

HR Manager

TRAINING HOURS DELIVERED

		2020	2021	2022
Total	<i>h</i>	3,242	4,281	9,366
→ By gender:				
Men	<i>h</i>	2,774	3,376	7,487
Women	<i>h</i>	468	905	1,879
→ By professional category:				
Managers	<i>h</i>	137	239	580
Executives	<i>h</i>	251	381	1,593
Employees*	<i>h</i>	2,854	3,661	7,193

* The term "employees" refers to all "white-collar" and "blue-collar" staff, i.e. all employees who are not considered managers within the Group.

AVERAGE TRAINING HOURS PER CAPITA

		2020	2021	2022
Total	<i>h</i>	4.08	4.92	10.1
→ By gender:				
Men	<i>h</i>	4.64	5.34	11.2
Women	<i>h</i>	2.39	3.82	7.3
→ By professional category:				
Managers	<i>h</i>	2.04	3.36	10.74
Executives	<i>h</i>	4.56	6.68	19.4
Employees	<i>h</i>	4.31	6.09	9.1

TOTAL NEW HIRES OVER THE YEAR

		2020	2021	2022
Total	<i>No.</i>	90	157	155
Percentage of new hires out of total employees				
	<i>%</i>	11%	18%	17%
→ By gender:				
Men	<i>No.</i>	75	104	105
	<i>%</i>	13%	16%	39%
Women	<i>No.</i>	15	53	50
	<i>%</i>	8%	22%	19%
→ By age bracket:				
Aged under 30	<i>No.</i>	23	50	44
	<i>%</i>	19%	37%	29%
Aged 30 to 50	<i>No.</i>	57	87	91
	<i>%</i>	10%	15%	16%
Aged over 50	<i>No.</i>	10	20	20
	<i>%</i>	6%	11%	10%

TOTAL EMPLOYEES WHO LEFT THE ORGANISATION

		2020	2021	2022
Total	<i>No.</i>	53	82	92
Percentage of employees who left the organisation out of total employees				
	<i>%</i>	6%	9%	10%
→ By gender:				
Men	<i>No.</i>	47	61	60
	<i>%</i>	8%	10%	9%
Women	<i>No.</i>	6	21	32
	<i>%</i>	3%	9%	12%
→ By age bracket:				
Aged under 30	<i>No.</i>	11	19	23
	<i>%</i>	9%	14%	15%
Aged 30 to 50	<i>No.</i>	36	52	42
	<i>%</i>	7%	9%	7%
Aged over 50	<i>No.</i>	6	11	27
	<i>%</i>	4%	6%	13%

04.3

COLLABORATOR HEALTH, SAFETY AND WELL-BEING

Creating a shared corporate culture, promoting transparent and constant internal communication and working to increase know-how provide a cohesive community of employees, which encourages and enhances their personal development, increasingly guided by the logic of entrepreneurship, motivation and ability to achieve.

The centrality of the Group's people, the commitment to creating shared value for all stakeholders, both internal and external, and the attention to social and environmental factors are a priority, as well as a fundamental requirement, to ensure the company's sustainable growth in the long term.

Part of Comelit's DNA is to focus on people and this applies first and foremost to all its employees. Each of us deserves to be able to express ourselves and give our best. **All together we are that human capital that Comelit has a duty to respect, accept and leverage in all its idiosyncrasies, diversity and inclusiveness.**

Creating a shared corporate culture, promoting transparent and constant internal communication and working to increase know-how provides a cohesive community of employees, which encourages and enhances their personal development, increasingly guided by the logic

of entrepreneurship, motivation and ability to achieve.

The enhancement of the human factor is considered a basic element for the solidity and growth of a company, but it also involves achieving the best possible balance between professional and private life.

Comelit's commitment is therefore also aimed at safeguarding health and safety, through the adoption of adequate prevention and protection measures and the development of an internal culture as such, based on training and information.

The emergency of the pandemic that is now behind us saw the Group maintain several additional safeguards for the protection of the health and safety of its staff, already in place in previous years, as well as ensuring the maintenance of a work-life balance while carrying out remote activities.

GRI 2-23
GRI 2-24
GRI 3-3

An increasing awareness of the importance of diversity in creating value for all and in supporting a positive corporate climate is essential to consistently reinforce the culture, overcome unconscious bias and reduce the gap that may still exist between intentions and behaviours.

In 2022, the Diversity and Inclusion Policy was issued, to promote a culture of diversity and equal opportunities and create an environment that leverages as far as possible all the idiosyncrasies of which it consists.

The management of issues concerning the protection of human capital is also made explicit in the Code of Ethics, which states that centrality, involvement and active participation of the human factor in business processes are fundamental objectives of the tools for managing and developing organisational behaviour, open to any individual regardless of their position in the company.

The Comelit Group considers value creation and competitiveness on the basis of the principles of respect and equality. In relation to this issue, we would like to recall the main policies adopted:

- Diversity and Inclusion Policy
- Health and Safety in the Workplace Policy
- Code of Ethics
- Social Dialogue Policy
- Child Labour Policy
- Privacy Protection Policy

For Comelit, collaborator well-being is a priority objective. This principle is implemented by means of adequate **planning of risk prevention, control and management systems**, and by **promoting good practice and appropriate conduct among the company's people**. Comelit's commitment to ensuring a fair **work-life balance** for employees is also central, with initiatives such as the new model of smart working and the introduction of flexible working hours.

TOTAL ACCIDENTS

		2020	2021	2022
Total deaths due to accidents at work	No.	0	0	0
Total serious accidents at work (excluding deaths)	No.	0	0	0
Total recordable accidents at work	No.	2	2	5

ACCIDENT RATE

		2020	2021	2022
Rate of deaths due to accidents at work	No.	0	0	0
Rate of serious accidents at work (excluding deaths)	No.	0	0	0
Rate of recordable accidents at work	No.	3.15	2.78	6.58

Recordable occupational accident rate = (number of recordable accidents at work/number of hours worked) x 1,000,000

GRI 403-9

Comelit acknowledges its role and responsibilities in guaranteeing all employees and collaborators a **healthy and safe work environment**, where everyone can feel protected, welcomed and respected in terms of their human and working rights.

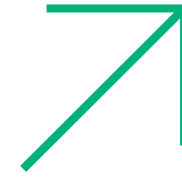
By means of a meticulous and constant risk assessment at its sites, Comelit can identify strategies and set up procedures to ensure high **safety standards** for the people who regularly spend time on company premises. For example, the assessments conducted over the year at the Italian site involved a wide range of design and operational spaces, leading to the construction of a **“risk matrix”** aimed at isolating the dangers and types of risk at the company.

The Comelit Group has adopted an **in-house Occupational Health and Safety Management System**, and has defined within its organisational structure precise responsibilities, operating procedures, processes sensitive to these issues and adequate economic resources for the implementation of strategies aimed at achieving high standards of health and safety in the workplace. Specifically, all Group subsidiaries are required to comply with the following **principles**:

- ensuring the fulfilment of safety and health in the workplace at every stage of the company’s

- processes, guaranteeing the effectiveness and implementation of precise **control** principles
- guaranteeing **transparency, fairness and traceability** with regard to the fulfilment of obligations towards the external bodies responsible for the control of safety in the workplace
 - informing counterparties of any risks to safety in the workplace **in the context of procurement or supply contracts and ensuring that the relevant preventive measures are taken**
 - in **contracts with third parties, as part of the activities** aimed at the management and prevention of risks in the field of health and safety in the workplace, laying down specific clauses committing to comply with its principles.

- In addition, Comelit actively works to **promote internal information** on:
- compliance with the technical and structural legal standards relating to equipment, systems and workplaces
 - risk assessment and consequent drafting of prevention and protection measures
 - organisational activities, such as emergencies, first aid, procurement management, periodic safety meetings, consultations with workers’ safety representatives.
 - health monitoring



OUR GROUP IS SUPPORTED BY AN EXTERNAL PREVENTION SERVICE THAT PROVIDES ADVICE AND SUPPORT TO THE COMPANY FOR THE PROPER MANAGEMENT OF RISK PREVENTION, WITH PARTICULAR REFERENCE TO: OCCUPATIONAL SAFETY MANAGEMENT, HYGIENE, HEALTH MONITORING AND ERGONOMIC, PSYCHOLOGICAL AND SOCIOLOGICAL ANALYSIS.

The percentage of human resources covered by **collective bargaining agreements** is provided below, each according to the respective type of national agreement. Please note that all employees in Italy are covered by collective bargaining agreements, as required by the relevant regulations.

EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS

		2020	2021	2022
Employees covered by Italian national collective bargaining agreements	No.	473	487	498
Percentage of total employees	%	60%	56%	54%



GRI 2-30
GRI 401-2
GRI 403-1
GRI 403-2
GRI 403-3
GRI 403-5
GRI 403-6

- worker information and training
- supervision of workers' compliance with procedures
- acquisition of documentation and certifications required by law
- periodic checks on the application and effectiveness of the procedures adopted.

The company's workplace health and safety system for all Group subsidiaries **provides for the fulfilment of obligations**, set out in accordance with various national legislative provisions, **relating to:**

- compliance with the technical and structural legal standards relating to equipment, systems and workplaces
- risk assessment and consequent drafting of prevention and protection measures
- organisational activities, such as emergencies, first aid, procurement management, periodic safety meetings, consultations with workers' safety representatives
- health monitoring
- worker information and training
- supervision of workers' compliance with procedures
- acquisition of documentation and certifications required by law
- periodic checks on the application and effectiveness of the procedures adopted.

CORPORATE WELFARE WORK-LIFE BALANCE

The Comelit Group believes in everyone's contribution to the success of business initiatives, and considers the constant enhancement of the human factor as a basic element for the solidity and growth of a company.

The centrality of the Group's people is also achieved through the full protection of collaborators' rights and the enhancement of staff through the promotion of training and merit. As such, Comelit has decided to implement incentive **policies and tools** aimed at improving its employees' **personal and family well-being**, by introducing policies and concrete measures to develop and strengthen an effective, modern and integrated corporate welfare system, the purpose of which is to foster a better work-life balance.

Precisely because it is aware of the importance of its employees' well-being in terms of their quality of life and work, the Comelit Group adopts multiple initiatives to respond to employees' various needs, by providing specific services in a range of areas:

- **Education:** contribution to expenses incurred for public or private nurseries, schools of all levels whether state-controlled or private (which result in the acquisition of a recognised qualification), universities and master's degrees, as well as expenses for language courses, language certifications, textbooks, playrooms, summer and winter camps
- **Vouchers:** issue of vouchers to purchase goods and services
- **Recreation, culture, leisure, well-being:** subsidies for package holidays, sports, recreational, educational, individual training and well-being activities
- **Transport:** contribution to expenses incurred to purchase subscriptions for public transport.

To ensure that these welfare pathways are effective and understood by all its collaborators, Comelit has organised **meetings and webinars** to explain how the platform and the welfare choices made work.

“FOR A COMPANY LIKE OURS, WHICH WORKS WITH TECHNOLOGY AND INNOVATION, IT’S THE PEOPLE AND THEIR SKILLS AND EXPERTISE WHO ENABLE US TO SUCCEED: MOTIVATED, DEDICATED PEOPLE WHO INVEST THEIR ENERGIES IN COMPLEX, STRUCTURED ACTIVITIES THAT REQUIRE AN OPTIMAL LEVEL OF WELL-BEING.”

SILVIA BRASI

President & HR Director

GRI 401-2



In its consideration of people as a core value, Comelit is committed to enhancing diversity and equal opportunities in the workforce, by following and promoting the principles of merit and expertise in line with the Group's values.

At the same time, it recognises diversity as a lever for growth and success: the heterogeneity of skills, abilities, cultural and social backgrounds, alongside the creation of an inclusive space that encourages constructive discussion of multiple experiences, represent an opportunity for Comelit to enrich its business with new perspectives and a prerequisite for growth and generating innovative solutions. The Group supports and fosters a culture consistent with these principles, which are formalised in the Diversity and Inclusion Policy.

04.4

DIVERSITY AND INCLUSION

GRI 401-1
GRI 3-3

The Comelit Group is convinced that **diversity** in all its forms is an **opportunity** to be grasped and channelled towards the creation of a healthy and welcoming workplace in which everyone can feel protected and valued. The company is therefore committed to ensuring its employees experience fairness in the workplace, guaranteeing **equal opportunities for** professional and personal growth and overseeing a climate of substantial **equality without discrimination** among the organisation's people.

Towards a renewed and progressive awareness of the importance of diversity and inclusion issues within the company, Comelit intends to **work internally on raising awareness among its people**, convinced that cultural change can and must start from everyone in the company. At Comelit, we make inclusion a guiding value in our corporate decisions, in the belief that diversity of thought, vision and attitude enriches the team with balance and uniqueness. The goal is to continue to create a professional, social and cultural environment in which everyone can identify, ensuring an inclusive, fair and non-discriminatory working climate, which respects and leverages the idiosyncrasies and potential of each collaborator. We want to cultivate an inclusive culture, oriented towards equal treatment and opportunities, listening to every member of the team and to guarantee recognition even outside the organisation.

In terms of new hires, **30%** were **aged under 30**, serving as a testament to Comelit's interest in employing **young new talent** in the organisation. It is also worth noting that within the Comelit Group, diversity is not only represented by age, but also by its naturally multi-cultural factor resulting from its many branches all over the world.

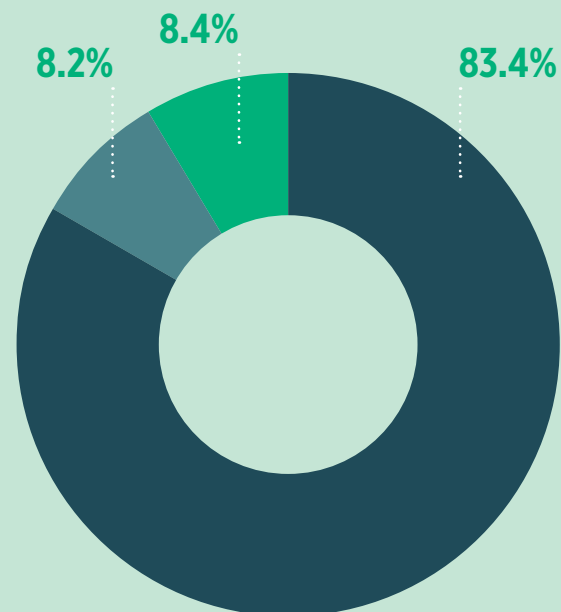


TOTAL NUMBER OF EMPLOYEES BY CATEGORY AND GENDER

		2020	2021	2022
Total	No.	794	869	928
→ Total Managers	No.	67	71	54
Men	No.	58	60	46
	%	87%	85%	85%
Women	No.	9	11	8
	%	13%	15%	15%
→ Total Executives	No.	66	73	82
Men	No.	55	57	66
	%	83%	78%	80%
Women	No.	11	16	16
	%	17%	22%	20%
→ Total Employees	No.	661	725	792
Men	No.	485	515	559
	%	73%	71%	71%
Women	No.	176	210	233
	%	27%	29%	29%

928
TOTAL EMPLOYEES, 2022

- Managers
- Executives
- Employees



TOTAL EMPLOYEES BY CATEGORY AND AGE BRACKETS

		2020	2021	2022
Total	No.	794	869	928
→ Total Managers	No.	67	71	54
Aged under 30	No.	0	0	0
	%	0%	0%	0%
Aged 30 to 50	No.	42	45	33
	%	63%	63%	61%
Aged over 50	No.	25	26	21
	%	37%	37%	39%
→ Total Executives	No.	66	73	82
Aged under 30	No.	1	1	1
	%	2%	2%	1.2%
Aged 30 to 50	No.	43	47	57
	%	65%	64%	69.5%
Aged over 50	No.	22	25	24
	%	33%	34%	29.3%
→ Total Employees	No.	661	725	792
Aged under 30	No.	116	134	137
	%	18%	19%	17%
Aged 30 to 50	No.	435	460	491
	%	66%	63%	62%
Aged over 50	No.	110	131	164
	%	16%	18%	21%

THE DEVELOPMENT AND TRAINING OF OUR COLLABORATORS GIVES US THE GREATEST OPPORTUNITIES TO MAKE AN IMPACT. INVESTING IN PEOPLE IS THE RIGHT WAY TO CONTINUE TO GROW AND MAKE OUR COMPANY INCREASINGLY ATTRACTIVE, INCLUDING FOR THE YOUNG TALENT WE ARE CONSTANTLY SEEKING.

04.5

COMMUNITY SUPPORT

With the aim of generating a positive impact on the communities and local areas where it operates, Comelit takes action – in Italy and around the world – by working on projects, making donations, raising funds and entering into partnerships with various associations, third-sector organisations, institutions and local authorities.

The aim is to create new synergies to promote educational, training and cultural activities, and to positively influence employment, growth, research, innovation and people's health and well-being.

At Comelit, we want to generate a positive impact on the communities and local areas where we operate, with the conviction that creating synergies with people and businesses must be a priority.

Through a series of initiatives and projects with social and cultural aims, partly carried out in partnership with associations, universities and non-profit companies, we are concretising our commitment to become a Group that can activate positive change in the local socio-economic fabric of the areas where our subsidiaries operate.

Comelit also assumes responsibility for creating **opportunities** for young students, by establishing a virtuous **talent retention** mechanism to invest in the educational and professional capital they have acquired.

Comelit supports schools with tools and products aimed at disseminating knowledge of home automation and video surveillance systems. Subsidised scholarships are also provided for students, giving them the opportunity to experience an internship at the company. The same *training programme* also exempts students from certain exams, replacing them with practical and experiential pathways at Comelit.

Believing in the talent of young people means investing in their future and that of the company where they will work. This is the philosophy Comelit follows in its training projects to prepare skilled and professional new people, whose spirit of initiative enables them to become part of the team, during training internships or *employer branding* activities.

We want to stand by people to concretise our commitment to integrating the social values on which we base our governance, concern a shared responsibility from which we do not wish to shirk. We do so by financially supporting certain social initiatives in the local areas where our branches operate, contributing to the implementation of their activities and initiatives to improve the future of their communities.

Comelit supports the importance of shared value development along the entire supply chain; it is essential to measure the economic, environmental and social impacts of its activities at a local level.

Aware of the importance of its activities for economic growth and for the well-being of the people and societies in which it operates all over the world, Comelit has entered into active dialogue with local communities and the various areas where it maintains a presence, proposing initiatives and projects designed to meet genuine needs that have been carefully identified and evaluated.

The goal is to create shared value for customers, people, communities and future generations, by playing an active role in society and taking into consideration requests from local areas. From time to time, we support projects in line with our values, fostering the growth and development of the community via:

- raising awareness on energy saving issues and the environmentally conscious use of resources
- development plans for innovation and training in the field of technology
- development of and attention to cultural and environmental heritage
- support, participation and awareness on health and safety issues
- enhancement of diversity and inclusion.



COMELIT FOR SOCIAL ISSUES – RENEWING OUR COMMITMENT TO FAIR TRADE

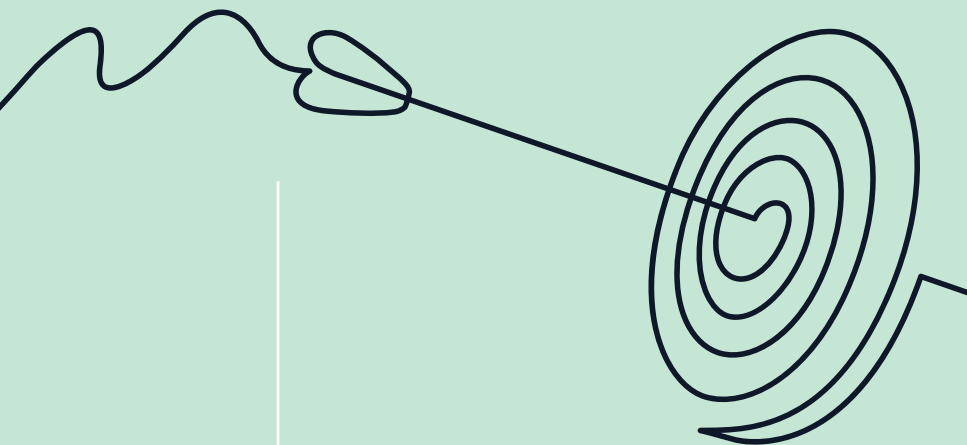
Sustainability is one of the values increasingly embraced by Comelit, because adopting a responsible business model means ensuring sustainable development that is strongly focused on the health of the planet and people's social and economic well-being.

*And it is precisely for people's social and economic well-being of people that **Comelit supports Fair Trade, by choosing products from farmers and artisans in the Southern Hemisphere.** This choice enables us to guarantee fair compensation to producers while protecting their land, the main source of income for them.*

04.6

SUSTAINABLE SUPPLY MANAGEMENT

Due to the importance of responsible procurement policies in risk management, Comelit has improved its supplier assessment criteria by integrating the analysis of the social and environmental impacts of the products and services provided.



To date, the process of identifying the Group’s suppliers makes it possible to assess aspects related both to governance and ethics, and to respect for human rights, workers’ health and safety, and environmental performance.

PEOPLE “WITH US”: OUR SUPPLIERS

With a view to continuously improving the responsible and sustainable procurement process, Comelit has launched a project that currently involves its main suppliers – due to be extended to an increasing number in the coming years – on the basis of clear and shareable criteria.

The current selection process takes into account the evaluation of suppliers in relation to performance not only in terms of quality and finance, but also in terms of ESG.

AS WELL AS THE PRICE OF THE GOODS OR SERVICES PURCHASED, COMELIT ALSO CONSIDERS ASPECTS OF ETHICS, PREVENTION OF CORRUPTION, CONFLICTS OF INTEREST, RESPECT FOR PROPERTY AND INTELLECTUAL PROPERTY VIOLATIONS DURING THE SELECTION PHASE.

Specific attention is also paid to safeguarding the principles of human and labour rights, the fight against corruption and the protection of the environment.

To this end, the Sustainable Procurement Policy specifies the general principles that form the basis for good relations with contractual partners: fairness and honesty, rejection of all forms of corruption, transparency and impartiality, prevention of conflicts of interest, fair competition, confidentiality, protection of workers and the environment. In addition, Comelit is committed to ensuring transparency and accountability throughout the selection process.

Since March 2020, the Purchasing Division has integrated the assessment of suppliers into the existing “Supplier Register”, with information on the social and environmental impacts of the products and services provided, and an assessment of the characteristics of the supply chain, including to respect and protect human rights.

To formalise agreements with suppliers, contractual formats are being defined that provide for the explicit acceptance of

anti-corruption and collusion regulations, the acknowledgement of the Comelit Group’s Code of Ethics and the acceptance of the Code of Conduct.

A project is also being implemented to expand the supplier evaluation criteria with the adoption of a **specific ESG Score**. The project aims to increase the knowledge of the partners, enriching the information relating to the ESG characteristics already provided for by the assessment model for those enrolled in the Supplier Register.

Comelit is committed to **promoting the principles and criteria of social and environmental responsibility that guide the Group’s activities within its supply chain and in its relations with business partners**. In this sense, as part of its supplier qualification and evaluation processes, Comelit has also introduced an ESG questionnaire, aimed at understanding the approach of its suppliers to sustainability and stimulating the definition and implementation of organisational, environmental, safety and ethical criteria.

GROUP SUPPLIERS

		2021	2022
Total suppliers	No.	2,150	2,327
Percentage of expenditure on local suppliers*	%	48%	50%
Percentage of expenditure on foreign suppliers*	%	52%	50%

* The data provided refer to the scope of the Group. Please note that during data collection, Group subsidiaries were asked to consider suppliers residing in the same geographic market as “local”. In addition, overseas subsidiaries were told not to consider the parent company as a supplier.

GRI 3-3
GRI 2-23
GRI 2-24

GRI 204-1

50

SUPPLIERS
SUBJECTED TO
ON-SITE AUDITS
IN 2022

Comelit requires its suppliers to adopt behaviours and actions in line with the principles set out in the Anti-Corruption Policy and the Code of Ethics. **In 2022, the Supplier Code of Conduct was disclosed, initially disseminated and signed by the main suppliers; it will soon be extended to all suppliers of products, goods and services. To date, the Code has been signed by 60% of suppliers.**

Visits and audits of the production process are also carried out regularly at suppliers' premises, to guarantee the highest quality standards. Comelit is convinced that a sustainable approach to business also involves the careful **initial selection of its suppliers** and constant, numerous **audits and vendor rating processes**. The constant and direct relationship with the supplier becomes a distinctive and extremely important element for Comelit to transmit the culture of sustainability to the entire supply chain. The training of the staff in charge of audits and of buyers are considered by Comelit to be indispensable and distinctive safeguards of a sustainable growth process, together with suppliers. The use of **environmental criteria** in the evaluation of close relationships along the supply chain is therefore useful to understand the **impacts** of the supply flow and to integrate policies and actions into the corporate strategy. The extension of sustainability assessment platforms (such as EcoVadis), including to the

main suppliers, will be the goal to be achieved in the coming years with the constant involvement of the entire supply chain.

The effort continues to improve the process of selection and search for new business **partners**: it not only makes use of an analysis conducted through the administration of questionnaires to verify the quality standards of potential *business partners*, but also uses in-depth surveys to evaluate **commercial** aspects – such as the competitiveness of the product or service in terms of cost-effectiveness, production, delivery or performance *timing* – and **technical** aspects, where extra attention is paid to the assessment of the qualifications of the organisation's management and employees, as well as the quality processes implemented. All with a specific focus on the attention that suppliers devote to **compliance with regulations**, sustainability principles and compliance with the Code of Conduct.

Another factor at the heart of Comelit's monitoring system is the **vendor rating**, a powerful and effective tool that provides a full and accurate assessment of the supplier on the basis of specific indicators that allow every aspect of the procurement service to be accurately monitored.

In 2022, **over 50 suppliers underwent on-site audits**, more than double the number the previous year.

AT COMELIT, RELATIONS WITH COMMERCIAL PARTNERS IN ORDER TO PURCHASE MATERIALS AND SERVICES ARE BASED ON STABLE PARTNERSHIPS CHARACTERISED BY MUTUAL TRUST AND RESPECT, PERIODICALLY EVALUATED THROUGH PROCESSES TO VERIFY AND ATTAIN QUALITY AND ETHICAL STANDARDS.

ALBERTO LAZZARI

Executive Director & Purchasing Director



IN 2022, CHEMICAL ANALYSES WERE CARRIED OUT ON OVER 1000 COMPONENTS/MATERIALS, ALL OF WHICH WERE FOUND TO BE COMPLIANT AND SAFE.

SAFETY OF RAW MATERIALS AND COMPONENTS

Comelit is committed to **verifying the compliance of its suppliers, to meet the requirements of the REACH Regulation and the RoHS Directive with respect to the presence of potentially hazardous substances in products and raw materials**. It does so both by meticulously collecting and evaluating the information required from suppliers, and by means of an active campaign of investigation and chemical analysis of the products in its catalogue, the aim being to guarantee its customers the utmost safety of the materials used in the manufacture of the products.

As a result of collaboration with one of the main accredited Italian laboratories, specialised in chemical and environmental analyses to verify the absence of polluting factors, Comelit has decided to commit to a multi-year program for REACH analysis, to check the compliance of items circulating in the EU market with Regulation (EC) No 1907/2006, as well as complete tests for compliance with the ROHS Directive, which limits the use of certain substances in electrical and electronic equipment (EEE) and their components. The state-of-the-art instrumentation used in this type of investigation meant that we were able to detect all the possible contaminants present in the samples and could determine their quantity. The products analysed are sampled every year on the basis of their origin, the quantities used and the level of risk associated with their use. As such, Comelit can also actively monitor its supply chain in compliance with the main environmental provisions.

04.7

RESPONSIBLE BUSINESS AND ANTI-CORRUPTION

The Board of Directors of Comelit S.p.A. has therefore decided to adopt an “Anti-Corruption Policy” in addition to the Group’s Code of Ethics. The Policy aims to provide guidelines for the fight against corruption and to disseminate within the Group the principles and rules to be followed to exclude corrupt conduct of any kind, whether direct or indirect, active or passive.

The Comelit Group has always done business in compliance with the ethical principles of legality, honesty, transparency, impartiality and respect, which form the basis of the corporate culture and are enshrined in the Group’s Code of Ethics. The increasingly important role that the Group has assumed at an international level makes it appropriate, in addition to its existing governance and guidance tools, to adopt an instrument that defines the principles and policies to be adopted

in the performance of corporate operations, to conduct them in compliance with the main international regulations aimed at preventing and repressing corruption of public officials and corruption between private individuals.

The Policy applies to managers, employees and collaborators of the Comelit Group, members of the corporate sector and all those who have professional relations with Group companies,

IN 2022, NO CASES OF CORRUPTION OR LAWSUITS INVOLVING GROUP EMPLOYEES OR EXTERNAL NETWORK OPERATORS WERE RECORDED.

GRI 3-3
GRI 2-23
GRI 2-24
GRI 205-3

CONFIRMED INCIDENTS OF CORRUPTION

	2020	2021	2022
Total incidents of corruption	No. 0	0	0
Incidents where employees were dismissed or subject to measures for corruption	No. 0	0	0
Confirmed incidents where contracts with business partners were terminated or were not renewed due to corruption-related violations	No. 0	0	0

within the scope of the activities carried out and within the limits of their responsibilities. It is brought to the attention of the recipients in specific communications.

Compliance with the rules set out in the Policy must be considered an essential part of the contractual obligations of Comelit Group employees, as well as for suppliers, external collaborators, consultants, business partners and agents.

With the adoption of this Policy, the commitment to comply with the anti-corruption laws by third parties who have professional relations with Group Companies will be provided for in specific contractual clauses and will also be included in the process of selecting and qualifying counterparties interested in collaborating with the Comelit Group, taking into consideration, for example, the adoption of a similar policy or the possession of specific certifications such as ISO 37001.

The fight against corruption aims to ensure the social and economic development of an organised community of people. Corrupt practices have a negative impact on the relationship of trust that must be maintained at all levels with public institutions and between

0

TOTAL INCIDENTS OF CORRUPTION

economic operators themselves, creating a system that distorts the positive effects of a market economy aimed at protecting essential common interests and rights.

Comelit is actively committed to the fight against all forms of corruption and prohibits any attempt at bribery, inducement to give or promise benefits, as well as the acceptance of any benefit that is intended to omit the duties of the function itself or to breach the obligations of loyalty.

For the future, Comelit intends to continue to maintain a high level of attention to the awareness of the importance of **social and ethical responsibility for the company**, dealt with by all the Group’s people.

GRI 205-3

INTERNAL WHISTLEBLOWING SYSTEM

The Comelit Group promotes a safe, ethical, and responsible work environment. In line with this approach, we offer the option for employees, business partners, suppliers and other parties to report episodes of corruption, fraud or other violations of internal rules through a guided path, which assists the whistleblower in formulating a precise and organised report.

It is essential that employees or others have the opportunity to report such anomalies so that the company can intervene promptly and remedy any illegal behaviour, such as corruption, fraud or other violations, which may harm the company itself and possibly third parties.

We received no reports through the whistleblowing system in 2022.

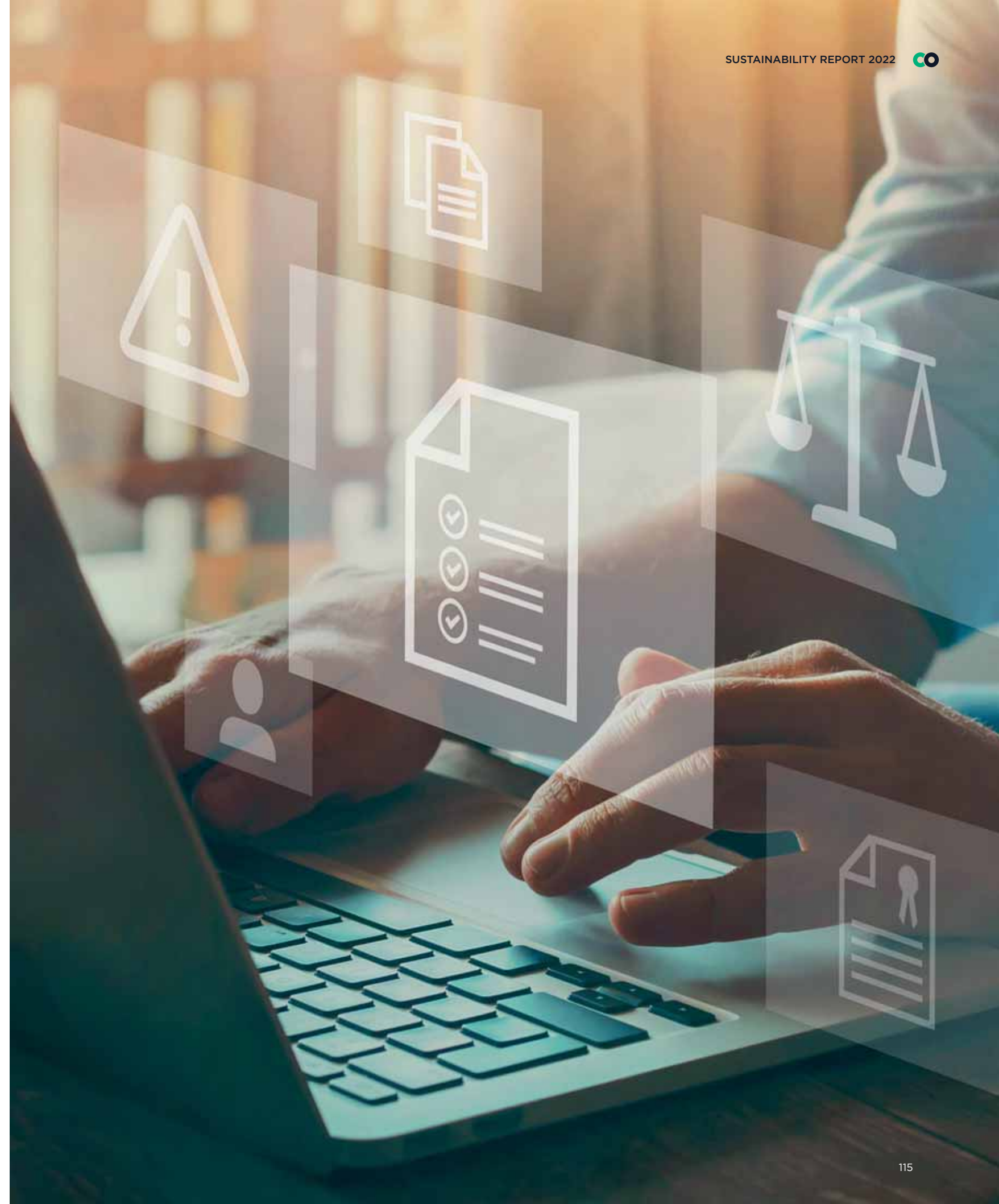
GRI 2-26

Therefore, in accordance with the regulations, the **Comelit Group has adopted an “Internal Reporting System” of acts or facts that may constitute a violation of the rules governing the activity carried out (“whistleblowing”), regulated and governed by a specific Whistleblowing Regulation.**

According to the provisions of this Regulation, the Whistleblowing Manager is the person responsible for receiving and examining reports. After evaluating the reports, the Manager takes action where necessary as part of an investigation. Investigations are carried out in such a way as to guarantee whistleblowers do not encounter any form of retaliation, discrimination or penalisation.

Comelit has also implemented a special computerised portal for the collection and management of reports of offences or unfair practices in the organisation. This channel provides a guided path, which assists the whistleblower in formulating a precise and organised report. The “Web Reporting” link provides access to the whistleblowing system, hosted on a third-party server. Reports are received by the Whistleblowing Manager, who handles the report confidentially and does not disclose the identity of the whistleblower without their consent. Any personal data that may be present are processed in compliance with the privacy regulations and retained for the time strictly necessary to manage the report. It is possible to enter into dialogue with the whistleblower through the IT platform to complete the report with indirect assistance. In parallel with the implementation of the new portal, the Whistleblowing Regulation is also being updated.

This tool joins other reporting methods, such as sending a report by e-mail, post or voicemail, as laid down in Legislative Decree 24/2023.





05

COMELIT WITH THE PLANET

- “Comelit with the Planet”¹¹⁸
// Energy efficiency and
reduction of emissions¹²⁰
// Circular economy and
waste management¹²⁴
// Sustainable product design¹³⁰
// Sustainable packaging¹³⁴
// Sustainable logistics¹³⁸



05.1

By means of its environmental policy, the Group establishes that its business and production system must be compatible with the social, environmental and economic responsibilities the company has assumed.

“COMELIT WITH THE PLANET”: WE BELIEVE IN A SAFER AND MORE SUSTAINABLE WORLD

In recent years, the Comelit Group has decided to embark on a path with the aim of making sustainability one of the cornerstones of its corporate credo, by committing itself to being a sustainable company and promoting a culture of sustainability.

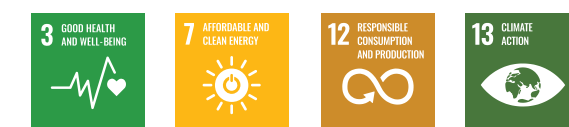
GRI 3-3

Even before the decision to stay ahead of the times in terms of European regulations or to respond to market requirements, the basis of setting out on this journey was an awareness of the extent to which the sustainable development goals were in line with the vision of our company and with its everyday operations. Indeed, if the philosophy behind our work is to contribute to creating a safer world by adopting methods that focus on the person – whether collaborator, customer or supplier – it is clear that the value of sustainability constitutes a hallmark of the very identity of Comelit.

As part of this vision, proximity to customers is combined with care for everyone who works with us and with attention to the community of which we form part and to which we are closely linked, as well as with a commitment to minimise the impact our operations have on the environment.

As part of this vision, technology – which permeates every aspect of our business – becomes an enabling tool to achieve the sustainable development goals we pursue. Our commitment is therefore to protect the environment and promote sustainability in all aspects of our business. We believe that by working together, we can have a positive impact on the environment and create a better future for everyone.

In the next few chapters, we will explore the guidelines, policies and actions undertaken by Comelit with respect to the **relevant issues** in the field of environmental protection, identified during the Materiality Analysis: energy efficiency and emission reduction, circular economy and waste management, sustainable design of its products, sustainable packaging and logistics.



MAJOR ENVIRONMENTAL ISSUES:



“SUSTAINABILITY IS SAFETY TAKEN FORWARD INTO THE FUTURE”.

SILVIA BRASI
President



05.2

ENERGY EFFICIENCY AND REDUCTION OF EMISSIONS

Over the years, the careful management and technological improvement of the production and service systems have made it possible to optimise energy consumption, as a result of technological innovation becoming the key to efficiency and cost containment.

For Comelit, it is very important to ensure effective **energy management** of operations directly related to company activities, to reduce the **environmental impact** generated by drafting suitable measures and policies. **Comelit's decision bears fruit in the pursuit over time of optimisation of the relationship between energy needs and the level of emissions produced, making the most of existing technological opportunities.**

The main projects to be developed over the next three years that follow the *Sustainability*

Roadmap include actions and solutions aimed at improving energy efficiency and the production and use of energy from renewable sources. Energy consumption data for 2022 are shown in the table below, expressed in gigajoules (GJ). Comelit's main consumption is electricity, followed by methane gas and diesel to power the company's fleets.

Energy consumption by the Comelit Group in 2022 was approximately **11,090 GJ**.

COMELIT PROMOTES A CONSCIOUS USE OF AVAILABLE RESOURCES THROUGH PRUDENT, OPTIMISED MANAGEMENT OF ENERGY SOURCES AND THE DEFINITION OF ENERGY SAVING TARGETS

GRI 3-3
GRI 302-1
GRI 305-1
GRI 305-2

FABIO BRASI

Executive Director & Facility Manager

ENERGY CONSUMPTION BY SOURCE

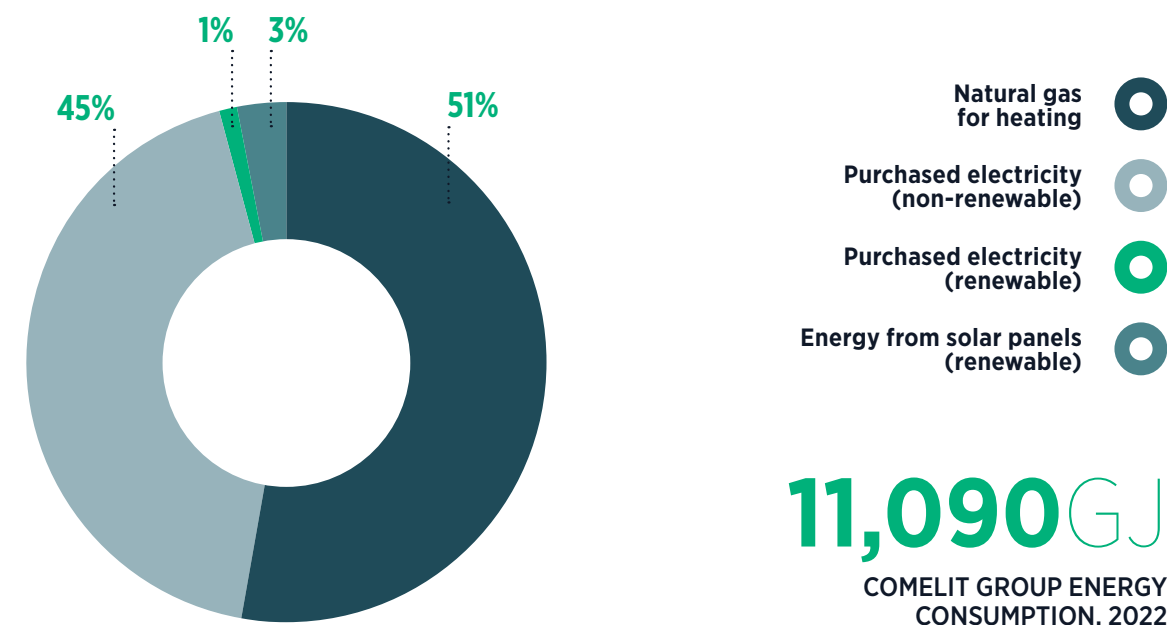
		2021	2022
Total	<i>GJ</i>	10,533.44	11,090
Consumption of natural gas for heating	<i>GJ</i>	5,600.82	5,696.00
Consumption of purchased electricity (non-renewable)	<i>GJ</i>	4,542.09	4,963.62
Consumption of purchased electricity (renewable)	<i>GJ</i>	103.67	114.02
Consumption of energy from solar panels (renewable)	<i>GJ</i>	287.56	316.73

In 2022, energy consumption was substantially in line with the previous year's and there was a 10% increase in energy production from photovoltaic panels.

In 2022, the constant search for energy efficiency and plant optimisation saw the continuation of projects started the previous year and the launch of new ones, as summarised below:

- replacement of lighting systems at all Group sites with **LED lamps** to save energy, as is the case with high-efficiency heating systems, with the aim of containing consumption and reducing emissions

- completion of the **photovoltaic system** at the new production plant in **Bulgaria**, with a nominal output of 678 kWp
- restructuring of certain branches, paying attention to **thermal insulation** and the installation of **energy-saving** windows, aimed at reducing consumption via heat loss from its heating systems
- optimisation of the energy consumption monitoring system
- increase in the proportion of certified **renewable energy** purchases
- in-depth analysis of the **emissions** produced and **consumption** throughout the Group's **value chain**.



The evaluation of the conversion and efficiency of the vehicles in the company fleet continues with the progressive replacement of diesel cars with new low-emission models, the introduction of certain electric and hybrid vehicles and the installation of charging stations in company car parks at some of the Group's branches.

Comelit currently has 295 electric, hybrid, petrol and diesel **company cars**.

To date, the Group is considering partial and gradual replacement of its **fleet** with internal combustion engines with *low-carbon* vehicles, and will arrange for the installation of electric charging stations where necessary.

CAR FLEET

		2021	2022
Total cars used by management	No.	176	164
diesel	No.	148	144
petrol	No.	18	10
hybrid and electric	No.	10	10
Total consumption, management car fleet	GJ	11,778.43	10,625
Total cars used by employees	No.	115	131
diesel	No.	105	112
petrol	No.	2	6
hybrid and electric	No.	8	13
Total consumption, employee car fleet	GJ	6,427.42	7,340.34
Total consumption, car fleet (managers and employees)	GJ	18,205.85	17,965.34

Direct Scope 1 emissions – relating to the consumption of natural gas for heating and fuel for the fleet with internal combustion engines – amount to approximately **1,585 tonnes of CO₂-equivalent**; **indirect Scope 2 emissions** – relating to the consumption of non-renewable electricity and the consumption of the hybrid and electric car fleet – amount to **approximately 612 tonnes of CO₂-equivalent**.

GREENHOUSE GAS EMISSIONS

		2021	2022
Scope 1	tonnes CO ₂ -eq.	1,677.06	1,585.12
Scope 2 (location-based)	tonnes CO ₂ -eq.	603.38	612.23

GRI 3-3
GRI 301-1
GRI 306-3



05.3

CIRCULAR ECONOMY AND WASTE MANAGEMENT

From the outset, the waste management policy at the Comelit Group's offices and all branches has prioritised the prevention of waste production at source, investing considerable efforts in the recovery and recycling of materials and the proper disposal of the non-recyclable elements.

From the outset, the waste management policy at the Comelit Group's offices and all branches has prioritised the prevention of waste production at source, investing considerable efforts in the recovery and recycling of materials and the proper disposal of the non-recyclable elements. Staff awareness, the definition of operating procedures on waste management and the involvement of companies specialised in collection operations have made a qualitative and quantitative improvement possible over time, with subsequent recovery/disposal of waste. In general, **Comelit pays the utmost attention to the environmental impact of its activities, both production and administrative, in terms of both design of products and packaging.** The company has always been committed to eliminating components that are difficult to recycle, to ensure the highest quality with the lowest impact.

In 2022, packaging design continued in the same direction, and also focused on **reducing the amount of plastics used in packaging**, as well as on the **replacement of part of the material currently used with new innovative and sustainable solutions and types**, with a much lower environmental impact than currently.



PERCENTAGE OF RETURNED PRODUCTS RECOVERED IN 2022

GRI 3-3
GRI 301-1
GRI 306-3



As stated in the Environmental Policy, the Group aims to encourage the development of **waste recycling and recovery processes**, by reducing waste generation upstream of the supply chain and by supporting a production system in harmony with society and the environment. Comelit is also committed to constantly **improving the efficiency of internal waste management**, and to guiding employees in the implementation and dissemination of good waste prevention and separation practices.

The Group considers the issue of the circular economy on the basis of eco-design, defining the reparability, updating, recyclability and durability of Comelit products as key elements in the design and development processes.

In Comelit's circular strategy, the management activities of recovery of obsolete, faulty or low-turnover products are particularly significant. Indeed, Comelit has adopted a worldwide process of their withdrawal, repair and re-marketing, or to recover the most significant components to be used as spare parts. In 2022, Comelit increased the recovery of this product category by more than 10%, demonstrating its ongoing commitment to a truly circular economy.

Comelit has decided to encourage the adoption of the Life Cycle Assessment (LCA) method, to make it an integral part of the design and development process of its products.

LIFE CYCLE ASSESSMENT (LCA)

In 2022, Comelit therefore made use of a company specialising in the application of the LCA method and commissioned a study to quantify the environmental footprint of the “door entry monitors (internal units)” family of products, by configuring a model and its real-world application on certain products considered ‘representative’ of the family under analysis.

As a first step, the model ‘structure’ of the products being studied was defined, consisting of:

- structural elements (shells and other mechanical components)
- functional elements (boards, integrated circuits, electrical and electronic components, etc.)
- video and touchscreen.

The study considered the following phases in the life cycle of the products:

- acquisition and processing of raw materials, including production processes of the materials/semi-finished products used in the representative products. The production of materials for the packaging of finished products is also included in this phase

- transport of products by suppliers, including the processes of transporting products from the manufacturing site
- packaging transport and packaging of finished products, including the transport of packaging materials. Packaging does not involve the use of additional energy and materials but only results in an increase in weight (product + packaging)
- distribution, including the transport of products. There are three distribution areas: Italy, Europe, outside Europe.
- usage, including the electrical consumption associated with the use of product during its lifetime
- end-of-life: the processes of disposal and recycling of packaging and disposal and recycling of certain parts of products.

After making the appropriate modelling choices, we then applied an impact calculation method used to quantify the environmental profile of products, the Environmental Footprint Method EF 2.0.

A number of considerations emerged from this study.

Following the approach suggested in the environmental footprint, the most relevant impact categories for electronic products are:

- Climate change
- Resource use, fossil
- Resource use, mineral and metals
- Ionising radiation, human health.

In these categories, the impacts measured were lower than the benchmarks used in the study. A model has been configured to quantify the impacts associated with the life cycle of the “door entry monitors (internal units)” family, based on a series of parameters shared by all the products in this family.

The life cycle phases with the greatest environmental impact have been determined, a factor Comelit is already considering in the design phase of its new product families.

A decision was made to give a further boost to the recovery of end-of-life products, with the aim of raising the recovery and reuse of all raw materials to 100%.

THE CATEGORIES OF IMPACTS CONSIDERED ARE SET OUT IN THE TABLE BELOW:

CATEGORIES OF IMPACT

Acidification [Mole of H+ eq.]
Climate Change - total [kg CO2 eq.]
Climate Change, biogenic [kg CO2 eq.]
Climate Change, fossil [kg CO2 eq.]
Climate Change, land use and land use change [kg CO2 eq.]
Ecotoxicity, freshwater [CTUe]
Eutrophication, freshwater [kg P eq.]
Eutrophication, marine [kg N eq.]
Eutrophication, terrestrial [Mole of N eq.]
Human toxicity, cancer [CTUh]
Human toxicity, non-cancer [CTUh]
Ionising radiation, human health [kBq U235 eq.]
Land Use [Pt]
Ozone depletion [kg CFC-11 eq.]
Particulate matter [Disease incidences]
Photochemical ozone formation, human health [kg NMVOC eq.]
Resource use, fossils [MJ]
Resource use, mineral and metals [kg Sb eq.]
Water use [m ³ world equiv.]

At Comelit, the proper management of waste starts from a thorough rationalisation of consumption related to materials used in non-productive business activities.

MATERIALS USED		2021	2022
Total weight of office materials used	<i>tonnes</i>	11.20	9.25
→ Paper used in offices	<i>tonnes</i>	10.88	8.90
Recycled paper (uncertified)	<i>tonnes</i>	3.90	3.52
FSC-certified paper	<i>tonnes</i>	4.58	3.31
→ Total toner and cartridges used	<i>tonnes</i>	0.32	0.35
Refurbished toner and cartridges	<i>tonnes</i>	0.05	0.06

WASTE MANAGEMENT. PREVENT TO REDUCE

Comelit promotes the **separate collection** of the main categories of waste, i.e. paper and cardboard, toner and cartridges. There are also special containers for the delivery of other differentiable waste, such as glass, plastic and batteries, identified according to the European Waste Catalogue (EWC).

The regulations governing every aspect of waste management are strict and complex. It is therefore essential for a company to pay attention to where the waste goes: in the wrong hands, it can create serious problems both from a legal point of view (according to the “extended liability of the waste producer”), in terms of the quality of recycled materials, and the repercussions it causes on the environment.

Comelit has therefore selected a company specialising in the recovery of waste electrical and electronic equipment (WEEE) that can no longer be reused, for various technical reasons.

To do so, Comelit decided to send this equipment for recovery, to put it back into circulation as new resources: the waste is then leveraged as a new raw material, fully bearing in mind the circular economy and with the utmost safety for both people and the environment.

The recovery of our WEEE is an activity where everything, even the smallest cable, wire, plate or other component, is broken down by hand to make it reusable, with the assistance of the latest ecological technologies. The company selected employs highly trained staff specialised in field of waste processing; it has four plants for shredding and separating recoverable materials, where the specialisation is second to none, and two plants for the disassembly of large electronic equipment.

The materials are sorted, weighed, handled, stored and processed according to strict rules. We are currently guaranteed a material recovery rate of 96% and our goal is to get as close as possible to 100%, in an attempt to prepare our WEEE for even more efficient recovery.

IN 2022, THE COMELIT GROUP PRODUCED A TOTAL OF 221.77 TONNES OF WASTE, ONLY LESS THAN 0.1% OF WHICH CONSISTED OF HAZARDOUS WASTE.

WASTE GENERATED

		2021	2022
Waste generated	<i>tonnes</i>	213.29	221.77
Hazardous waste	<i>tonnes</i>	0.28	0.27
Non-hazardous waste	<i>tonnes</i>	213.01	221.5

Comelit is reiterating its commitment in terms of **prevention and management of plastic waste, including by adopting a specific policy on the use of plastics**, which specifies that it intends to enhance the circular processes that prioritise

reusable products, aiming to generate as little waste as possible from this category, and by taking concrete actions, explained in further detail below.

For Comelit, it is essential to design durable and efficient goods, to combine the usability of the product by the end customer with the ease of implementation by the installer. At the same time, attention is always paid to the handling of raw materials, to guarantee a high recyclability coefficient and a low overall environmental impact for the products.

Comelit has integrated environmental aspects into design and development, to minimise the negative environmental impacts of its products. It therefore promotes an environmentally conscious design (ECD) policy, not as a separate activity, but as an integral part of design and development within the organisation. It then established a strategy to determine the objectives of the ECD, including the allocation of resources (e.g. financial, human resources, and lead time for task completion). The strategy also involves relevant internal and external company stakeholders, supported by the indications provided in standard 14006, which sets out how to integrate an ECD into an organisation. This was especially relevant for a company like Comelit, which can count on a tried and tested ISO 14001 management system.

Comelit believes that the only way to accurately study the entire life cycle of a product is to apply a design methodology that includes the demands of environmental sustainability and the functional, economic and aesthetic aspects. Durability, reusability, the possibility of product upgrades and repairs, assessment for the presence of substances that may hinder product circularity, careful use of resources and raw

materials with the involvement of the entire supply chain, and minimising indirect energy resources, are just some of the aspects Comelit considers in the design of new products. All this becomes food for thought to reduce the environmental impact of the products as well as products currently on the market.

Comelit is committed to broadening the use of PEF or OEF methodologies within the organisation, which involve measuring environmental performance throughout the life cycle of products; the results obtained and the consequent environmental declarations then become a tool for corporate credibility.

Comelit's strategy for environmentally conscious design of safe products includes the following points:

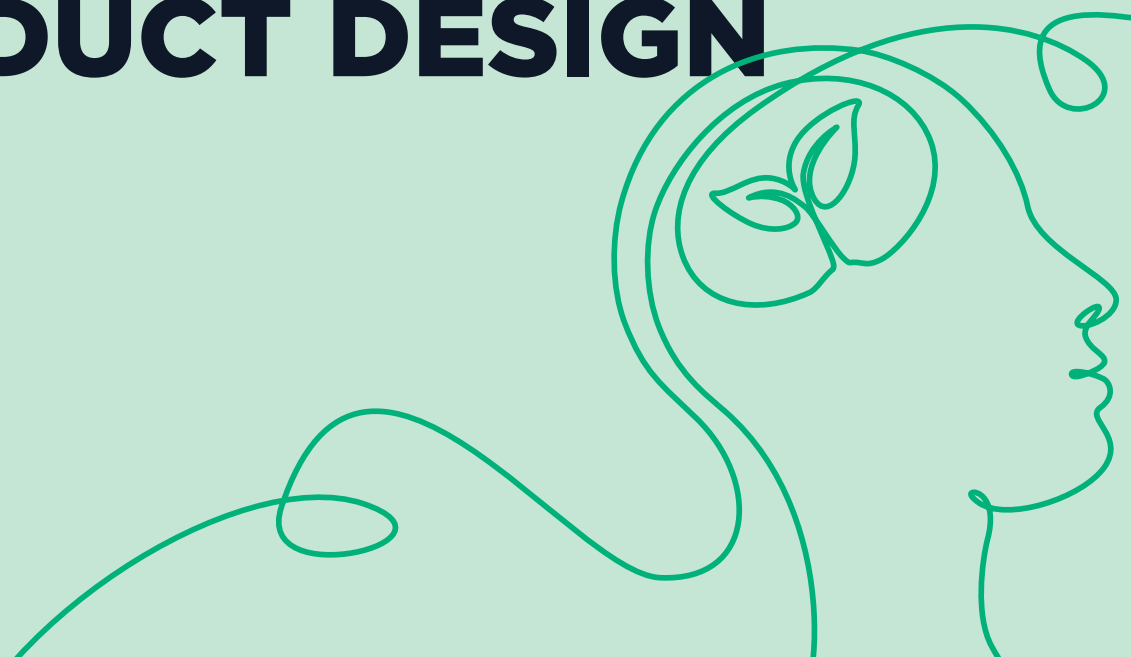
- significant environmental impact
- optimisation of processes during the life cycle of a product
- support for product design that minimises environmental impact over the life cycle
- disclosure of information on environmental performance throughout the life cycle of products (e.g. through the documentation accompanying the product, websites and apps, sustainability report)
- disclosure of its environmental claims, especially by ensuring sufficient reliability and completeness of the declarations

- identification of significant environmental impact
- optimisation of processes throughout the supply chain
- doing everything needed to increase the availability of high-quality lifecycle data, via actions aimed at developing, collecting and examining data collected from the supply chain.

THE RESULTS OF THE LCA HAVE ENABLED COMELIT TO IDENTIFY AREAS FOR IMPROVEMENT WITH RESPECT TO THE PRODUCTION OF PRODUCTS AND HAVE SUPPORTED THE CONSTRUCTION OF THE DOUBLE MATERIALITY MATRIX SETTING OUT THE ENVIRONMENTAL ISSUES RELEVANT TO THE GROUP.

05.4

SUSTAINABLE PRODUCT DESIGN



WHEN CAN A PRODUCT BE CONSIDERED SAFE?

Under normal or reasonably foreseeable conditions of use, including durability and, where applicable, commissioning, installation and maintenance requirements, whether the product presents no or only minimal risks, compatible with the use of the product and considered acceptable in compliance with a high level of protection of people's health and safety of persons, depends most of all on the following:

- the product features, especially its composition, packaging, how it is assembled and, where appropriate, installed and maintained
- the effect of the product on other products, where it can be reasonably foreseen that the former will be used with the latter
- the presentation of the product, its labelling, any warnings and instructions for its use and disposal, as well as any other indications or information relating to the product
- categories of consumers who are at risk when using the product, especially children and the elderly.

Software, hardware and functional type approval tests are crucial to ensure **that Comelit products comply not only with current and applicable regulations**, but also with high quality standards based on test specifications developed in-house. Comelit preserves and expands this valuable practical and cultural background every year on the basis of market research, field testing and its truly unique experience in the sector.

To support of this policy, investments continue both in new human resources and in state-of-the-art equipment to carrying out tests and trials to verify the following characteristics:

- protection of the health and safety of people and property
- suitable level of electromagnetic compatibility
- effective use of the radio spectrum to avoid harmful interference
- cybersecurity.

As we all know, electrical and electronic devices are ubiquitous, used almost everywhere on Earth in very different installation and operating conditions. The same piece of equipment must therefore work despite the climatic conditions and mechanical stresses normally undergone by a component, device, appliance, system, etc. The need for our products to respond adequately to this highly diverse range of conditions has been accentuated in recent decades as a consequence of the globalisation of markets that now affects most products, and the technological diffusion in increasingly vast geographical areas. In addition, there is a growing need for electrical and electronic equipment and devices to have a very high degree of reliability and to be able to operate properly and continuously without supervision in the widest range of locations and conditions.

Before release, installation and becoming operational, appliances and devices must therefore be subjected to tests that simulate the climatic and mechanical conditions expected to be faced in the various phases of their life cycle (transport, installation, operation, etc.). For Comelit, environmental tests must therefore simulate the situations and conditions of foreseeable mechanical and climatic stresses as close as possible to reality, to ensure the full functionality of the appliance in real-world conditions.

COMELIT CONTINUES ITS COMMITMENT TO STRENGTHENING TESTS AND CONTROLS ON ITS PRODUCTS, TO PROVIDE ITS CUSTOMERS WITH HIGH-QUALITY, DURABLE, RESISTANT AND SAFE PRODUCTS

Comelit carries out numerous environmental tests, to ensure their quality or compliance with functional and safety requirements. These include:

- climatic tests (temperature, humidity, pressure, solar radiation, precipitation, etc.)
- mechanical tests (impacts, vibrations, shocks, etc.)
- biological (presence of mould, flora, fauna, etc.)
- tests with chemical agents (salt spray).

In addition to the great reliability, safety and functionality provided by Comelit products, a fundamental aspect for the Group is **the design of the equipment and the** constant drive towards creative innovation in the product lines. To confirm this approach to design, the numerous international awards Comelit has obtained in the field of industrial design attest to the creativity and ability of the company to reinvent and make its products more aesthetically attractive. Major examples of these accolades include the **ADI Design Index** for the 2017Visto doorbell, and the **German Design Award**, received the same year for the **Quadra** entrance panel, the **Icona** door entry monitor and the **Maxi** monitor. In 2018, Comelit was also named "Best of" in the **Design Plus Awards** in Frankfurt, for the **HUB** wireless intrusion detection system.



05.5

SUSTAINABLE PACKAGING

Saying goodbye to plastic is our manifesto against unnecessary waste, from packaging to the components of the product themselves. This eco-revolution is not just aesthetic, but reflects our mission to transform the way we design packaging, proving that elegance can also be sustainable.

In addition to the materials and aesthetics, we were also looking for change in printing technology: as a result of adopting adoption of water-based inks, we have definitively abandoned the use of the chemical solvents found in the most common inks.

This choice is not only a technological evolution, but a declaration of responsibility towards those who use our products and live on our beloved planet.

The People door entry monitor is just the beginning of this extraordinary transformation. The new eco-friendly packaging (EcoBox) will immediately become the new normal for all Comelit products. We are committed to

exceeding the standards, setting the pace, and shaping a future where technology and environmental responsibility co-exist in harmony. Moving in this direction not only respects the environment, but will also greatly simplify our customers' work by eliminating the complications related to the disposal of materials.

With this transition, we demonstrate our ongoing commitment to reducing the use of plastics, addressing one of the most pressing environmental challenges of our time. Partnering with greener products not only benefits the environment, but also reflects our commitment to improving our reputation and market position.

**A REVOLUTIONARY CHAPTER IN OUR COMMITMENT TO A MORE SUSTAINABLE FUTURE.
TO COINCIDE WITH THE LAUNCH OF THE PEOPLE DOOR ENTRY MONITOR, COMELIT
HAS PRESENTED THE NEW PACKAGING, 100% MADE OF CARDBOARD – AN INITIATIVE
THAT TRANSCENDS SIMPLE INNOVATION, DEFINING OUR CONCRETE COMMITMENT TO
REDUCING ENVIRONMENTAL IMPACT.**

GUIDO GATTI
R&D Manager





INTERNAL BRIEF

WHY PACKAGING?

In a brief on reducing the environmental impact of its packaging, the company opened a new window on design that took into account the recent rebranding.

Something that could merely be considered protective casing is actually a valuable resource to transmit and convey the company's values of quality and attention to detail. An initial analysis of the company and its various competitors made it clear that the packaging system is still neglected by the main manufacturers of door entry phones. The packaging is still perceived as a sterile casing of the main product, ignoring the potential of a more systemic consideration. In fact, it can provide an opportunity for new, much broader services, beyond its current protective dimension.

At the moment, this product category suffers from a lack of narrative coherence between the mission of the different companies in the sector and their proposal of protective casing. The total absence of a human-centred design approach is reflected in anonymous products that end users find difficult to understand. The communicative function of the packaging is diminished through a disturbing repetition of the manufacturer's logo, which in most cases creates a distance from the product inside.

ONE OF THE BIGGEST ISSUES

ENCOUNTERED IS AN APPARENT

FLATTENING OF THE OFFER

TOWARDS INSUFFICIENT QUALITY

STANDARDS. IT IS IMPOSSIBLE TO

PERCEIVE DIFFERENCES BETWEEN

PRODUCTS AIMED AT DIFFERENT

MARKET SEGMENTS.

The origin of this issue is to be found in the lack of design of the external casing of these electronic devices. In many cases, financial profit is the only factor considered, neglecting more far-sighted reflections on the topic of sustainability, not only in terms of the environmental but also the economy and society. The packaging sector also plays a key role in the management of solid waste, as the main player in its production. Greater environmental responsibility, a feature of the current and future generations, has placed these issues under the magnifying glass of public opinion, resulting in improvements at several leading companies in the sector.

The concept of sustainability is not only linked to the material composition of packaging, but above all to the adoption of a business model that aims to reduce waste and intensive consumption of natural resources. It is therefore impossible to ignore the term 'circular economy', i.e. a business model based on a closed system that uses biological and technical inputs to add value to existing goods, avoiding over-exploitation of natural resources.

In this regard, Comelit was inspired by the 4R model for the design of its new packaging:

- Recycling: using packaging to produce raw material to be reused for the same purpose
- Reuse: using packaging more than once, even to contain products of different kinds
- Renewal: using biodegradable and environmentally friendly materials for packaging
- Recovery: designing new ways to improve current packaging through economically and environmentally sustainable solutions.

15% decrease in CO₂ emissions compared to the EMEA average, based on the HBEFA factor methodology.

In 2022, the quantity of CO₂-equivalent produced as a result of road transport in Italy amounted to 96.58 tonnes, an improvement on the previous year.

As for the commitment to sustainability front, the multi-year programme continues to “identify subcontractors who are already contributing to sustainable logistics, while encouraging even more investment in green technologies to reduce our, our carriers’ and our customers’ CO₂ footprint”, the transport company explains in a note. Carriers will need to demonstrate that they have an environmental or sustainability strategy in place, that they can measure their CO₂ footprint and be transparent in their communications.

Road haulage certification is one of the means to achieve the company’s goal of reducing greenhouse gas emissions to below 29 million tonnes by 2030 and to zero by 2050. Our partner states that road haulage produces 21% of the total emissions resulting from its operations, “in addition to the electrification of last-mile and the investment in drives and alternative fuels in its fleet, another important lever is the scope of sustainable transport services provided by the Group’s service partners”.

Specifically, during Comelit’s latest audit of the supplier, the following evidence was collected:

- 83% of carriers have a sustainability strategy, almost twice the number in 2021 (42%)
- transparency went from 27% to 37%
- advanced technologies have gone from 5 to 29%
- a growing number of zero/low-emission vehicles: 337 electric vehicles, 88 hybrids
- 9 suppliers using alternate fuels: 70 bio-LNG vehicles, 68 LPG
- 15% multimodal solution offerings.

All these initiatives have led to a significant 15% reduction in CO₂ emissions compared to the EMEA average, based on the HBEFA factor methodology.



05.6

SUSTAINABLE LOGISTICS

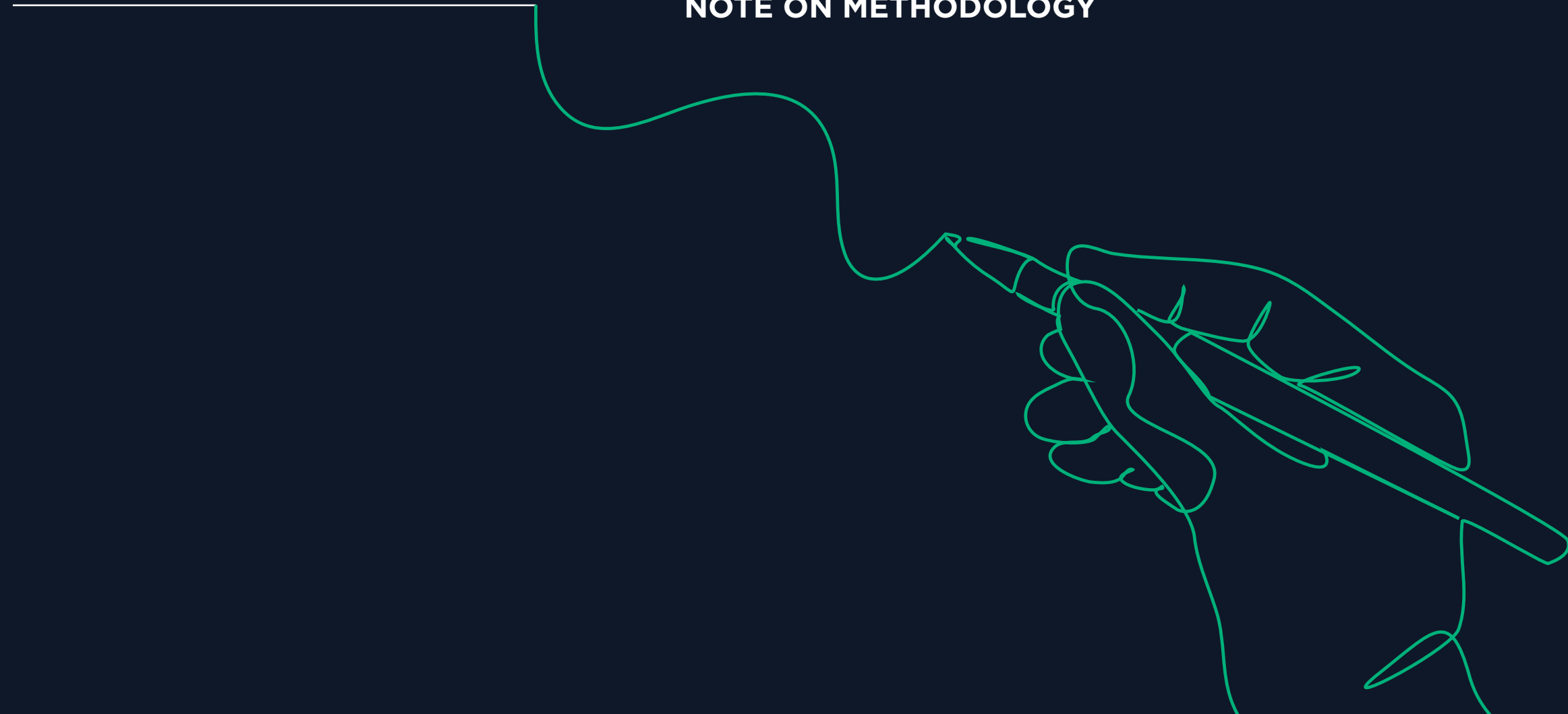
GRI 3-3
GRI 305-3

MONITORING OF THE ENVIRONMENTAL IMPACT RELATING TO THE DISTRIBUTION OF OUR PRODUCTS BY OUR PARTNER IS CONTINUING AND BEING PERFECTED. THIS LEADING LOGISTICS COMPANY THAT PAYS SPECIFIC ATTENTION TO REDUCING CARBON DIOXIDE EMISSIONS AND TO SETTING HIGH SOCIAL AND ADMINISTRATIVE STANDARDS.



06

NOTE ON METHODOLOGY



06.1

NOTE ON METHODOLOGY

The Group’s Sustainability Report was drafted using the “Global Reporting Initiative Sustainability Reporting Standards” (GRI Standards), drawn up in 2016 according to the “with reference to” approach and made possible by the methodological support of SCS Consulting.

The basis for reporting economic, environmental and social performance took into consideration the period from 1 January 2022 to 31 December 2022, in relation to the entire Group.

The drafting of this document involved an internal process, **in which various company departments** contributed to the creation of the report. The materiality analysis conducted in 2021, which made it possible to identify the issues perceived as having the greatest impact and on which the Group is focusing its efforts, has not been updated.

To provide a comprehensive and comparable picture, data for the three-year period from 2020 to 2022 were reported where possible, alongside an indication of the objectives and initiatives that the Group as a whole intends to undertake in the near future.

This report was prepared by the Comelit Group, involving various business areas as well as its international subsidiaries, in both data collection and descriptions and comments.

For further information, contact info@comelit.it

GRI 2-2
GRI 2-3

GRI CONTENT INDEX

STATEMENT OF USE

Comelit has reported in accordance with the GRI Standards the information cited in this GRI content index for the period from 1 January 2022 to 31 December 2022

USE GRI 1

GRI 1: Foundation 2021

GRI Standard	Disclosure	Page number(s) and/or link(s)	Omission
GENERAL DISCLOSURES			
ORGANIZATIONAL PROFILE			
GRI 2: General Disclosures (2021)			
	2-1 Organizational details	page 16	
	2-2 Entities included in the organization’s sustainability reporting	page 142	
	2-3 Reporting period, frequency and contact point	page 142	
	2-4 Restatements of information	No revisions were made to the data with respect to the 2021 financial statements	
	2-5 External assurance	This document is not subject to external third-party assurance	
	2-6 Activities, value chain and other business relationships	pp. 12, 16, 22, 36	
	2-7 Employees	page 84	
	2-9 Governance structure and composition	pp. 20, 42	
	2-13 Delegation of responsibility for managing impacts	page 42	
	2-14 Role of the highest governance body in sustainability reporting	page 42	
	2-22 Statement on sustainable development strategy	page 05	
	2-23 Policy commitments	pp. 28, 96, 108, 112	
	2-24 Embedding policy commitments	pp. 96, 108, 112	
	2-26 Mechanisms for seeking advice and raising concerns	page 114	

GRI Standard	Disclosure	Page number(s) and/or link(s)	Omission
	2-28 Membership associations	page 38	
	2-29 Approach to stakeholder engagement	page 50	
	2-30 Collective bargaining agreements	page 98	
GRI 3: Material topics (2021)			
	3-1 Process to determine material topics	page 50	
	3-2 List of material topics	page 52	
MATERIAL TOPIC: INNOVATION, RESEARCH AND DEVELOPMENT			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 60	
MATERIAL TOPIC: CUSTOMER CENTRICITY			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 64	
GRI 417: Marketing and Labeling (2016 version)			
	417-2 Incidents of non-compliance concerning product and service information and labeling	pp. 64-68	
	417-3 Incidents of non-compliance concerning marketing communications	pp. 64-68	
MATERIAL TOPIC: DATA PRIVACY AND CYBERSECURITY			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 70	
GRI 418: Customer Privacy (2016 version)			
	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	pp. 72-74	
MATERIAL TOPIC: EMPLOYEE HEALTH, SAFETY AND WELL-BEING			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 96	

GRI Standard	Disclosure	Page number(s) and/or link(s)	Omission
GRI 401: Employment (2016 version)			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	pp. 98-100	
GRI 403: Occupational Health and Safety (2018 version)			
	403-1 Occupational health and safety management system	page 98	
	403-2 Hazard identification, risk assessment, and incident investigation	page 98	
	403-3 Occupational health services	page 98	
	403-5 Worker training on occupational health and safety	page 98	
	403-6 Promotion of worker health	page 98	
	403-8 Workers covered by an occupational health and safety management system	For the 2022 reporting year, 25% of all Comelit Group employees are covered by an occupational health and safety management system	
	403-9 Work-related injuries	page 97	
MATERIAL TOPIC: DEVELOPMENT AND ENHANCEMENT OF HUMAN CAPITAL			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 86	
GRI 404: Training and Education (2016 version)			
	404-1 Average hours of training per year per employee	pp. 87, 92, 94	
	404-2 Programs for upgrading employee skills and transition assistance programs	pp. 87-88	
MATERIAL TOPIC: DIVERSITY AND INCLUSION			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 102	
GRI 401: Employment (2016 version)			
	401-1 New employee hires and employee turnover	pp. 94-102	

GRI Standard	Disclosure	Page number(s) and/or link(s)	Omission
GRI 405: Diversity and Equal Opportunity (2016 version)			
	405-1 Diversity of governance bodies and employees	page 104 With regard to the members of the governing body, please note that: <ul style="list-style-type: none"> • 20% of the governing body consisted of women • 20% of the members of the governing body were aged under 50, with 80% aged over 50. 	
MATERIAL TOPIC: COMMUNITY SUPPORT			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 106	
MATERIAL TOPIC: SUSTAINABLE SUPPLY MANAGEMENT			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 108	
GRI 204: Procurement Practices (2016 version)			
	204-1 Proportion of spending on local suppliers	page 109	
MATERIAL TOPIC: RESPONSIBLE BUSINESS AND ANTI-CORRUPTION			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 112	
GRI 205: Anti-corruption (2016 version)			
	205-3 Confirmed incidents of corruption and actions taken	pp. 112-113	
MATERIAL TOPIC: ENERGY EFFICIENCY AND REDUCTION OF EMISSIONS			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	pp. 118, 120, 122	
GRI 302: Energy (2016 version)			
	302-1 Energy consumption within the organization	pp. 120-122	

GRI Standard	Disclosure	Page number(s) and/or link(s)	Omission
GRI 305: Emissions (2016 version)			
	305-1 Direct (Scope 1) GHG emissions	page 120	
	305-2 Energy indirect (Scope 2) GHG emissions	page 120	
MATERIAL TOPIC: CIRCULAR ECONOMY AND WASTE MANAGEMENT			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 124	
GRI 301: Materials (2016 version)			
	301-1 Materials used by weight or volume	pp. 124-128	
GRI 306: Effluents and waste (2016 version)			
	306-3 Waste generated	pp. 122, 124, 129	
MATERIAL TOPIC: SUSTAINABLE PRODUCT DESIGN			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 130	
MATERIAL TOPIC: SUSTAINABLE PACKAGING			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 134	
MATERIAL TOPIC: SUSTAINABLE LOGISTICS			
GRI 3: Material topics (2021)			
	3-3 Management of material topics	page 138	
GRI 305: Emissions (2016 version)			
	305-3 Other indirect (Scope 3) GHG emissions	page 138	

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YOU
ALWAYS**



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