



**Sustainability Report**  
2022

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# 1 Letter to stakeholders



*At Comac, we dream of a future where cleaning is eco-friendly, accessible to all and improves the quality of the places and environments where people work and live.*



Our vision is clear-cut and encapsulates our corporate objectives, which are grounded in the values that have always distinguished us: people, innovation and both environmental and social responsibility. Our progress towards increasingly ambitious targets is a testament to our dedicated team and the innovative cleaning solutions we consistently introduce to the market. This success further heightens our awareness of the necessity for our growth to be sustainable – an awareness that today marks a very important new step for Comac: the publication of our first Sustainability Report, in which we want to present the company's vision of sustainable development.

In the present historical climate, shaped by the lingering effects of the Covid-19 pandemic and geopolitical instability arising from recent conflicts, the company has had to demonstrate remarkable adaptability to maintain its competitive edge in the immediate and foreseeable future. All this is achieved without compromising our enduring commitment to monitoring and minimising the environmental footprint of our entire production process. Comac is proactively contributing towards the achievement of several Sustainable Development Goals (SDGs) as outlined in the UN Agenda 2023. Therefore, the shift towards a sustainability model that melds business operations with environmental, social, and governance concerns has prompted Comac to provide ever more innovative products, with a heightened consciousness of factors impacting human lives and the quality of our surrounding environment.

Sustainability and people have always been at the core of our innovations: from projects related to the re-use of wash water from scrubbing machines, to the new SELF.Y collaborative scrubbing machine that increases efficiency by improving the quality of work for professional cleaners, to lithium-ion battery technology that eliminates fossil fuels and carbon emissions while using our products, to the calculation of the product climate footprint of our latest generation of scrubbing machines according to the guidelines of ISO 14067:2018 certification. When we design a new product, we always take functionality, quality of materials, availability of components for maintenance and the lifespan of the product itself as our starting points. We know that one way not to have a negative impact on the environment is to make sure our products are long-lasting and resistant and that the materials they are made of can easily be recycled. It is with these principles in mind that we strive to design the machines of the future, for making cleaning ever more eco-friendly.

Comac has recently made significant strides in supporting people and the supply chain by achieving SA 8000:2014 certification. This shows, both in Italy and abroad, that our production cycle is ethical and focuses on reinforcing the rights of those involved. Through this approach, we aim to empower our customers to endorse and partake in the ethical decisions taken by the company, thereby generating value both internally and externally, raising awareness across the professional cleaning industry. At Comac, we continuously strive to foster an inclusive and open work environment where everyone, irrespective of gender, has the chance to reach their full potential.

Publishing this Sustainability Report represents a modest yet significant stride in acknowledging the various initiatives that Comac has progressively implemented in relation to social responsibility. It also serves to guide the company's expansion towards a path of ever-greater sustainable development.

*Giancarlo Ruffo*

*Chairman of Comac S.p.A.*

## 2 Methodological note



Comac S.p.A has long prioritised sustainability. By taking action, developing technology, and using resources responsibly, we aim to reduce our organisation's impact. We have engaged all company areas in working towards this ambitious goal, from designing to finally delivering our products, right up to creating distribution channels, and our final users.

We foster a culture of social responsibility at Comac S.p.A, aiming to integrate responsible practices into our employees' everyday routines. We also dedicate ourselves to producing our products with the environment in mind, investing in sustainable solutions and technologies, seeking recyclable materials, and creating long-lasting machines.

As we continue on our path, in 2022 we resolved to create our inaugural Sustainability Report. This document serves as a means to share our dedication and progress in the realm of sustainability with our customers, suppliers, and all other stakeholders.

The initial stage involved creating a Materiality Analysis, which allowed us to comprehend the economic, social, and environmental impacts that our stakeholders perceive as significant. Through the Materiality Analysis, we engaged with our stakeholders to identify Comac S.p.A's material topics. These form the foundation of this Sustainability Report, in line with GRI 3 of 2021.

The material topics were presented to and approved by the Management on 13 March 2023.

This Sustainability Report has been drawn up in accordance with the "GRI Sustainability Reporting Standards", published by the Global Reporting Initiative (GRI) in 2021, and it refers to the year 2022 (from 1 January to 31 December), in the same way as the Annual Financial Report. The Sustainability Report has been drawn up for the first year, and annual publication is envisaged, in keeping with the Annual Financial Report. This report focuses solely on the single **operational base of Comac S.p.A.**, located at 13 Maestri del Lavoro Street in Santa Maria di Zevio, Verona. As a member of a Tax Grouping that produces legally mandated, certified consolidated financial statements encompassing all group entities, Comac S.p.A.'s sustainability report differs by presenting only its own data.

This Sustainability Report was drawn up with the support of Aequilibria Srl – SB.

# 3 About Comac

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- 3.1 Who we are
- 3.2 Our values
- 3.3 Our history
- 3.4 Our mission

183

Employees at the Santa Maria di Zevio plant

200

Worldwide distributors operating in the B2B market, with a network of resale customers

22%

Women

81

Countries of operation

500

Suppliers, of which 93% are Italian

### 3.1 WHO WE ARE

Comac S.p.A., located in Santa Maria di Zevio, Verona, has earned a distinguished reputation both in Italy and abroad for designing and manufacturing professional cleaning machines.

Comac's product range encompasses over 60 items, including scrubbing machines, sanitising machines, sweeping machines, vacuum cleaners, single disc machines, and pressure washers. Alongside our machinery, we bring nearly 50 years of industry expertise, as well as a commitment to innovation and simplicity designed to cater to the requirements of end users across various sectors.

### SECTORS

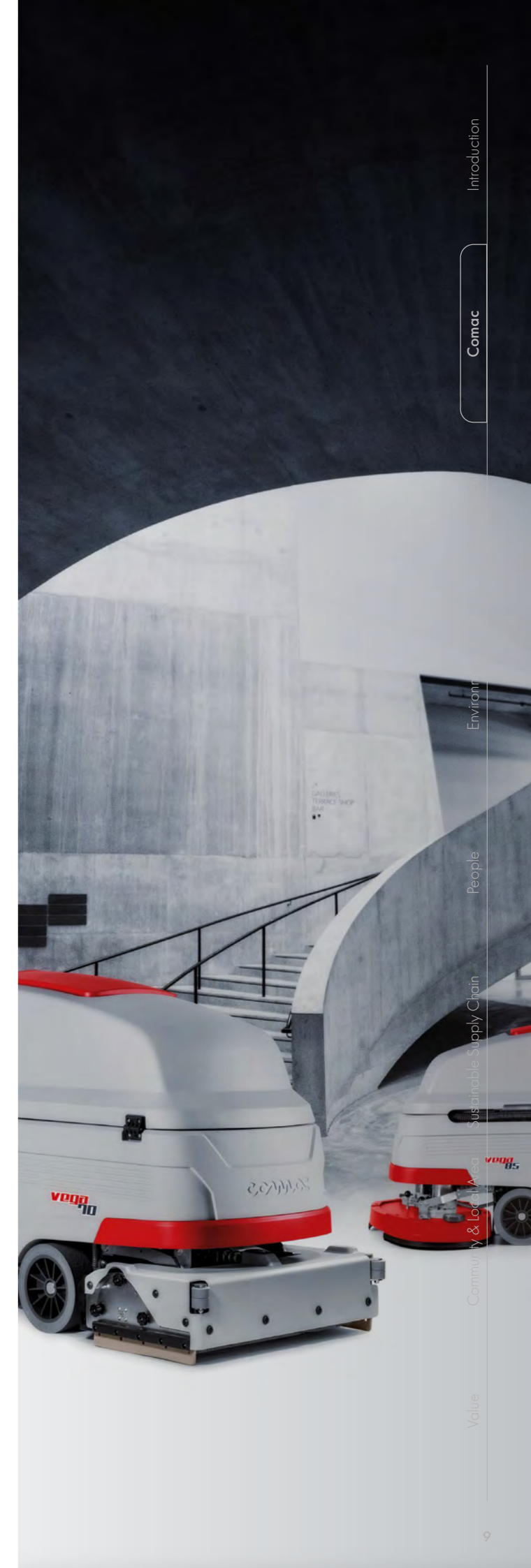
Industry	Cleaning contractors	Health	Retail
Large-scale retailing	Logistics	Ho.Re.Ca.	Public
Well-being and sports	Handicraft	Automotive	Transportation

In our pursuit of innovation and in the manufacturing of our products, we have consistently dedicated ourselves to identifying the most sustainable solutions that address the need for a world with minimal environmental impact from its activities.

### PRODUCTION

Year	Total units
2021	14,139
2022	12,955

Production is primarily allocated between scrubbing machines, accounting for approximately 96% of the total, and sweeping machines, comprising around 2% of the total.



## MARKETS

In 2022, Comac was active in the markets of the following countries:



Italy - Great Britain - Poland - Morocco - Iceland - India - Belgium - Canada - Denmark - Finland - Luxembourg - Malta - Netherlands - Norway - Sweden - USA - Albania - Austria - Bulgaria - Switzerland - Czech Republic - Greece - Croatia - Hungary - Romania - Serbia - Slovenia - Slovakia - Kosovo - Montenegro - Macedonia - Argentina - Brazil - Chile - Colombia - Dominican Republic - Ecuador - Mexico - Peru - Paraguay - Spain - Portugal - Azerbaijan - Belarus - Estonia - Kazakhstan - Lithuania - Latvia - Russian Fed. Russia - Ukraine - Uzbekistan - Turkey - Indonesia - South Korea - Malaysia - Pakistan - Singapore - Thailand - Taiwan - Vietnam - United Arab Emirates - Bahrain - Israel - Kuwait - Mauritius - Nigeria - Oman - Qatar - Saudi Arabia - Tunisia - Turkey - South Africa - China - Togo - Ivory Coast - Indonesia - Egypt - France - Germany - Ireland

## GROWTH OBJECTIVES

Geographical area	Expected increase in 2022
Germany	+28%
Spain	+9%
France	Consolidate
Italy	+5%
United Kingdom	+6%
Rest of Europe	+8%

Geographical area	Expected increase in 2022
Middle East	+23%
Oceania	+27%
Asia	+12%
North America	Consolidate
South and Central America	+30%
Africa	+95%

### 3.2 OUR VALUES

Every single woman and man who has worked for Comac has played a pivotal role in our extensive history in shaping what has become an organisation that fills us with immense pride – an organisation founded on professionalism and shared values. “Comac professional people” is not just a simple company slogan; it is a

promise that has been kept for almost fifty years in our dealings with customers, suppliers and the local area and community in which our company operates. This professional approach is the company’s strength, built on individuals who have earned Comac S.p.A. global recognition.

## VALUES



#### THE VALUE OF PEOPLE

The energy and enthusiasm of the people who currently work or have worked in Comac in the past is the recipe for our company’s decades of success in Italy and the rest of the world. We firmly believe that our people are our most valuable asset, which is why we are dedicated to fostering meritocracy, embracing diversity and inclusion, honouring individuality, and being attentive to their needs.

#### THE VALUE OF FAMILY

Comac’s strength also stems from its identity as an Italian family-owned enterprise – a business model that enables us to uphold our internal standards and to concentrate wholeheartedly on the company’s future and the realisation of our objectives.

#### THE VALUE OF COMMITMENT TO CUSTOMERS

Our pursuit of the finest technologies has consistently been guided by two primary objectives: full customer satisfaction and user-friendliness. Our company ethos is firmly rooted in the conviction that the finest technology is one that not only drives innovation but also retains simplicity of use and caters to the requirements of the end users of our machines. This philosophy has consistently underpinned the development of Comac’s projects, which are conceived and evolved with these foundational principles in mind, providing bespoke solutions tailored to our customers’ requirements.

#### THE VALUE OF QUALITY AND INNOVATION

Our enduring objective for our products has been to enhance people's quality of life, the quality of spaces, and the work quality of those who operate our machines. To accomplish these objectives, we are continuously pursuing innovation to stay ahead of the curve. It takes courage to be innovative. We get it from knowing that we are offering excellent quality, the fruit of constant research, attention to detail, constant tests on our machines and our reliable technology.

#### THE VALUE OF RESPONSIBILITY

Every day, through actions large and small, we strive to protect the health of people and the environment by trying to reduce our environmental impact. At our production sites we take care to use energy, water and materials, including raw materials, sustainably. We encourage our collaborators to adopt a culture of reducing emissions, eliminating waste and properly managing rubbish. Through these initiatives, we acknowledge our capacity to make a tangible contribution towards minimising our environmental footprint and reinforcing our dedication. We aim to set a standard for the entire cleaning industry and serve as a model for both our suppliers and customers.

#### THE VALUE OF LOYALTY

We want to carry out our work in a fair and proper way. We show loyalty, trust and honesty when it comes to our customers and our suppliers, because we want our relationships to have value. We believe in letting people make informed choices and we always honour the promises we make.

### 3.3 OUR STORY

Comac has had an eventful history. There have been glorious moments and tougher moments, but it has always been people at the centre of our journey. Challenges always get bigger in the cleaning market,

but Comac has always had the capacity to innovate and rejuvenate itself. This capacity for innovation is what has made it a leading brand in the sector for professional floor cleaning.

**1974** Giancarlo Ruffo, together with Domenico Accadia, decided to meet the demand of the floor scrubbing machine market with Comac, short for "Costruzione Macchine". Their first, handmade models saw the light at their little base in San Giovanni Lupatoto. These years saw the launch of the Lavait – Comac's first Scrubbing machines.



**1981** Comac went to the sector's most important international trade fair for the first time: ISSA InterClean in Amsterdam.



**1984** Comac grew rapidly and acquired its first headquarters in Via Ca' Nova Zampieri, still in San Giovanni Lupatoto, where it designed, produced and marketed its entire product range.



**1985** Comac became a public limited company.



**1992** The company achieved international status following the incorporation of a third partner, the German multinational Henkel, which subsequently transitioned into Ecolab.



**1996** Another essential step for the company came when it got its first ISO quality certificate for design and construction of electromagnetic machines compatible with humans and the environment and standardisation for the machines in line with existing legislation on quality.



**2003** The team consisting of all the companies and brands within the Ruffo family has now officially formed the Comac Group, which includes Comac, Fimap, and TMB.



**2007** The pulse of change and Comac's desire to further stamp its presence in foreign markets led to the founding of Comac Shanghai.



**2009** The project to recycle water used by scrubbing machines – known as "Non Stop Cleaning" – began.



**2010** Constant growth forced the company to expand its structure. Comac therefore transferred its base to a new, extremely modern and technological site spread over an area of 23,000 m<sup>2</sup>, still in the province of Verona.



**2015** The subsidiary Comac France is born.



**2015** The innovative Comac Fleet Care (CFC) system lets you manage your own fleet of cleaning machines remotely, collecting data from them and turning it into valuable information for optimising processes and making cleaning more efficient.



**2016** The subsidiary Comac India is born.



**2019** Comac has always been sensitive to the environment, which is why it was keen to find solutions to help save water. Recycling water used in cleaning is a solution the company believes in, and was its starting point for the concept behind #comac4water, the natural successor to the "Non-Stop Cleaning" project begun ten years before.



#comac4water

**2020** The subsidiary Comac Iberia is born.



**2020** Comac develops and obtains third-party certification for the Carbon Footprint Systematic Approach (CFP-SA) calculation model to calculate the climate footprint of its products.



**2021** Comac obtains SA8000 certification on corporate social responsibility



**2022** Comac presents SELF.Y, the autonomous scrubbing machine





### 3.4 OUR MISSION

Comac champions and promotes the culture of cleaning by offering innovative, reliable, and professional solutions that improve people's quality of life: that is our company's mission.

The importance we attach to cleanliness is closely associated with the understanding that it allows us to inhabit environments that are safe for our health. This is a revolution that has transformed our way of living and will continue to do so.

That is why we are consistently committed to providing solutions that enable highly professional cleaning and that improve the safety of the various spaces where people spend their days, travel and work. We strive for innovation every day, to understand and predict the future so our cleaning solutions can be reliable and better people's quality of life.



*We dream of a future where cleaning is eco-friendly, accessible to all and improves the quality of the places and environments where people work and live.*



# 4 Our commitment

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- 4.1 Stakeholder engagement
- 4.2 Materiality analysis
- 4.3 Comac's contribution to the sustainable development goals

214

Internal and external stakeholders involved

32

Impacts deemed material for Comac

6

Stakeholder categories

6

Sustainable Development Goals followed

### 4.1 STAKEHOLDER ENGAGEMENT

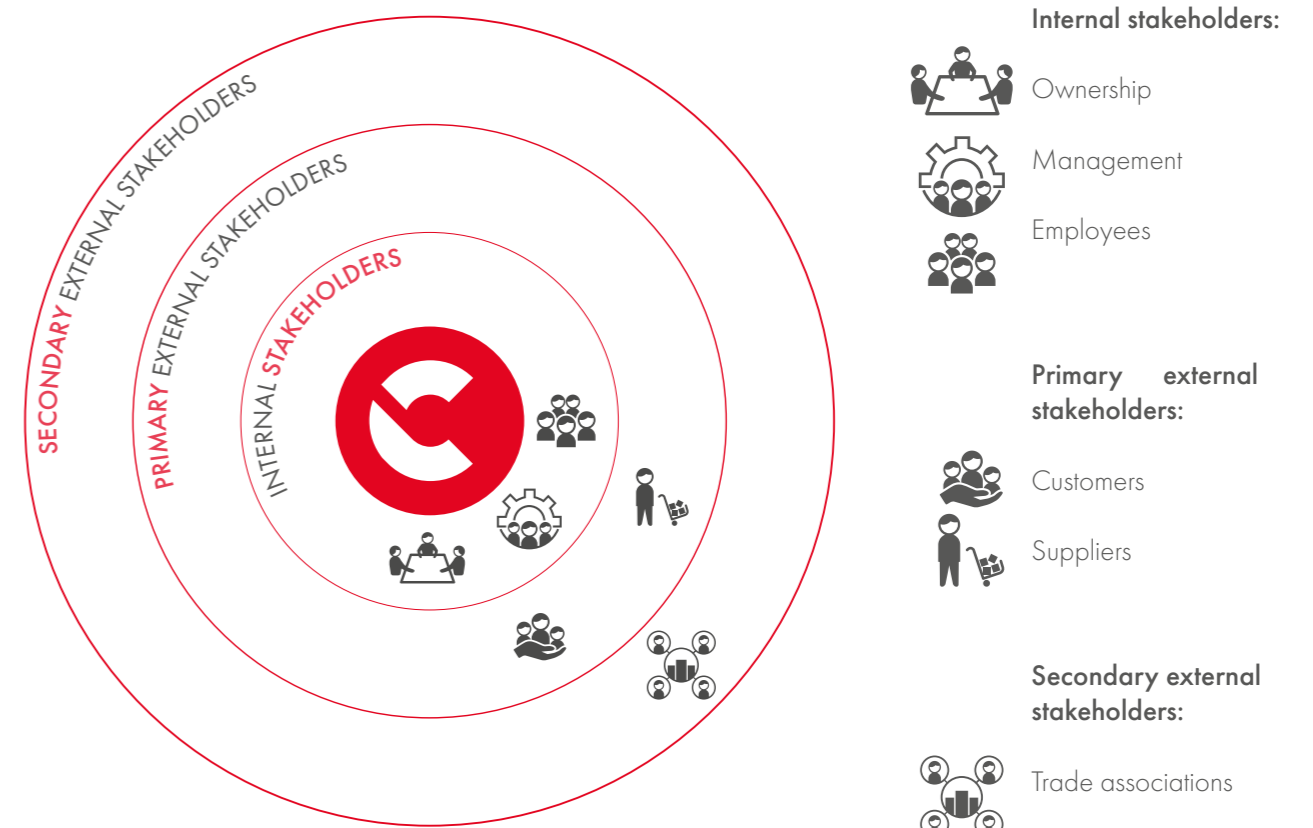
Our dedication to a journey of sustainability begins with the active participation of our stakeholders, encompassing both internal and external parties. Comac fosters productive and continuous partnerships, engaging collaboratively in matters of sustainable development as well as environmental, social, and economic concerns.

The preparation of Comac's inaugural Sustainability Report has centred specifically on engaging key stakeholders. This was done to thoroughly explore their expectations of Comac regarding present sustainability challenges and to understand their interests in this area.

Consequently, we initiated a dialogue that yielded valuable insights and observations. Comac will consider these in our ongoing efforts to enhance and prioritise stakeholder engagement.

We have chosen to engage the trade association AFIDAMP as a stakeholder due to their expertise in the sector.

Here is an overview of the categories of stakeholders that were selected and engaged to collect feedback and contributions during the materiality analysis phase:



Stakeholder categories	Selected	Involved	% Involved
Customers	309	80	26%
Suppliers	483	89	18%
Management	3	3	100%
Employees	183	40	22%
Owners/Shareholders	1	1	100%
Trade associations	1	1	100%
<b>TOTAL</b>	<b>980</b>	<b>214</b>	<b>22%</b>

## 4.2 MATERIALITY ANALYSIS

The materiality analysis is the initial critical step in the development of a Sustainability Report that truly grasps the magnitude of the economic, social, and environmental impacts – whether positive and/or negative – considered priorities by Comac’s stakeholders, both within and outside the company. This stage is particularly crucial in the process of creating a Sustainability Report, as it enables the organisation to gain a comprehensive understanding of the facets of its operations that impact aspects of sustainability, as well as how these are accounted for within its internal and external spheres.

The concept of materiality has been incorporated by the Global Reporting Initiative (GRI) as a foundational element to align reporting more closely with stakeholders’ expectations. In accordance with the GRI Standard 2021, Comac has established a process to identify its material topics, which are the aspects deemed most significant by stakeholders. This process includes the following steps:

- 1 understand the organisation’s context, through an analysis of the company’s activities and relationships, aimed at identifying a significant sample of stakeholders;
- 2 identify actual and potential impacts, by learning and analysing its past and future impacts on the economy, environment and people;
- 3 assess the significance of the impacts through a quantitative and qualitative impact analysis by administering a questionnaire and conducting interviews;
- 4 prioritise the most significant impacts for reporting purposes.

Upon identifying the relevant internal and external stakeholders for Comac, we pinpointed several potential or actual impacts within the realms of sustainability – encompassing environmental, social, and economic aspects – through an analysis of our internal context and operations.

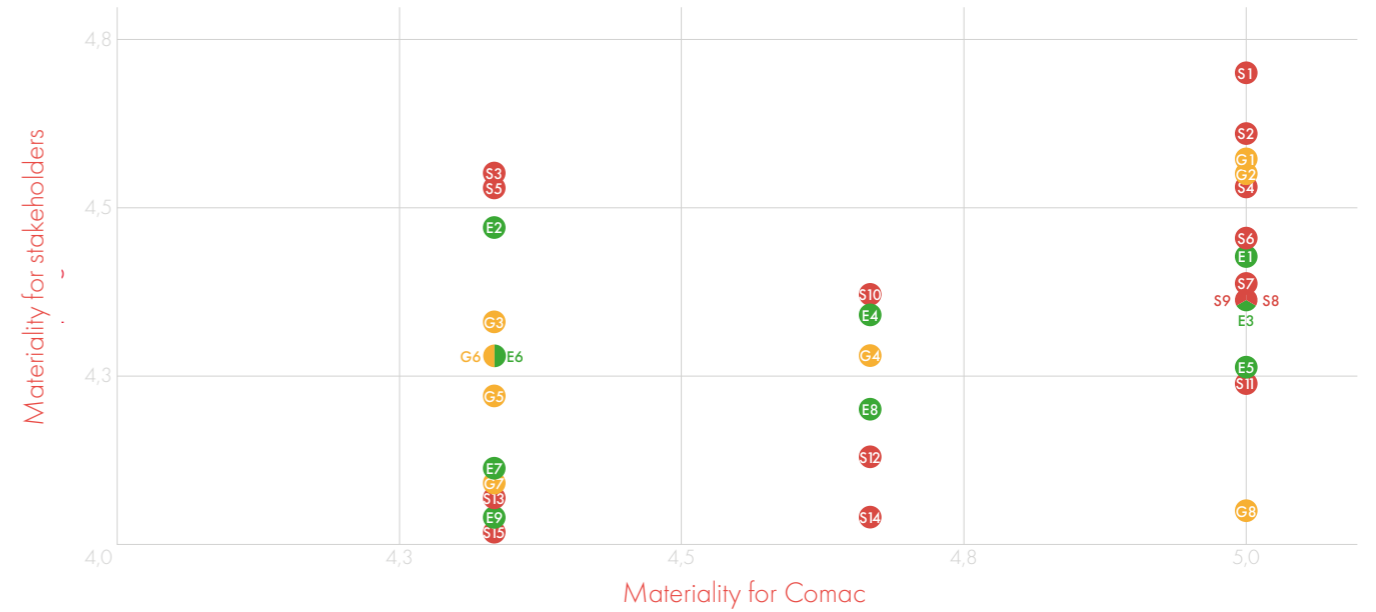
Regarding these impacts, we conducted a stakeholder engagement exercise using a questionnaire designed for quantitative analysis, which offered us a comprehensive and overall perspective on our stakeholders’s perception and expectations regarding the impacts we had previously identified.

In addition to a purely quantitative analysis, stakeholder engagement played a crucial role in facilitating a qualitative analysis, which was conducted through a

series of interviews with a selected sample. This phase of the materiality analysis allowed for an in-depth exploration of aspects deemed important by key stakeholders, furnishing Comac with valuable insights for its corporate strategies and priority goals. Consequently, potential challenges, areas for enhancement, and opportunities were identified. Additionally, impact assessments for the medium and long term have been conducted.

Upon completion of the analysis phase, we achieved a depiction of the impacts most significantly perceived by our stakeholders. This enabled us to rank these impacts, thereby identifying the most critical ones for inclusion in our Sustainability Report, referred to as material topics. We have decided to encompass all depicted impacts within our report, as feedback from our stakeholders indicates that each considered impact is pertinent to the true nature of Comac’s operations.

The material topics are succinctly depicted in a two-dimensional matrix, where the x-axis indicates the materiality of the issues to Comac, and the y-axis denotes the materiality of the issues to the stakeholders concerned.



E Environmental Topics		S Social Topics		G Governance Topics	
<b>E1</b>	Atmospheric emissions and climate change	<b>S1</b>	Occupational health and safety	<b>G1</b>	Customer relations and collaboration
<b>E2</b>	Waste management	<b>S2</b>	Safe use of products	<b>G2</b>	Supplier relations and collaboration
<b>E3</b>	Energy consumption	<b>S3</b>	Employment and employees	<b>G3</b>	Governance
<b>E4</b>	Water discharge management	<b>S4</b>	Staff training and education	<b>G4</b>	External communications
<b>E5</b>	Water consumption	<b>S5</b>	Protection of workers’ rights	<b>G5</b>	Corporate transparency
<b>E6</b>	Use of sustainable materials and packaging	<b>S6</b>	Training and refresher courses for end users	<b>G6</b>	Economic performance
<b>E7</b>	Selection of raw materials based on environmental parameters	<b>S7</b>	Non-discrimination	<b>G7</b>	Economic impact on the local area and community
<b>E8</b>	Circular economy	<b>S8</b>	Wage equity	<b>G8</b>	Obtaining voluntary certifications
<b>E9</b>	Supplier environmental assessment	<b>S9</b>	Ethics and integrity		
		<b>S10</b>	Suppliers’ respect for social and human rights		
		<b>S11</b>	Equal opportunities		
		<b>S12</b>	Collaboration with local institutions, schools and universities		
		<b>S13</b>	Social impact on the local area and communities		
		<b>S14</b>	Diversity and inclusion		
		<b>S15</b>	Freedom of association and collective bargaining		

Subsequently, these topics were grouped into three categories – environmental, social, and economic – consistent with the classification in the GRI standards and in accordance with the descriptions provided by the GRI guidelines.

The materiality matrix was finally approved by Management on 13/3/2023.

### Comac s.p.a. material topics

### Impacts of Comac (positive and negative)

Supplier relations	<ul style="list-style-type: none"> <li>Consolidating relations</li> <li>Ensuring a reliable supply chain</li> <li>Deterioration of relations in cases of bad management of relationships and payments</li> </ul>
Customer relations	<ul style="list-style-type: none"> <li>Attracting potential new customers</li> <li>Customer loyalty</li> <li>Deterioration of relations in cases of bad management of relationships and poor customer experience</li> </ul>
Supplier social assessment	<ul style="list-style-type: none"> <li>Meeting legal requirements</li> <li>Extending social responsibility to the supply chain</li> <li>Potential episodes of exploitation or non-compliance in the supply chain</li> </ul>
Training	<ul style="list-style-type: none"> <li>Capacity-building of individual employees</li> <li>Knowledge development</li> <li>Skills upgrading</li> <li>Allocation of economic resources to training</li> <li>Loss of competitiveness due to insufficient training</li> </ul>
Use of sustainable materials and packaging	<ul style="list-style-type: none"> <li>Selection of raw materials with less impact on the environment</li> <li>Reduction of non-recyclable waste</li> <li>Increased research and replacement costs for current materials</li> </ul>
Economic performance	<ul style="list-style-type: none"> <li>Value creation</li> <li>Spending on suppliers</li> <li>Sound business management</li> </ul>
Freedom of association and collective bargaining	<ul style="list-style-type: none"> <li>Consolidation of relations with trade unions</li> </ul>
Health and safety	<ul style="list-style-type: none"> <li>Workplace injuries</li> <li>Occupational diseases</li> <li>Reduction in absenteeism due to illness or injury</li> <li>Increase in injuries due to incorrect management</li> <li>Reputational risks</li> </ul>
Product safety	<ul style="list-style-type: none"> <li>Reputational risks in case of malfunctions</li> </ul>
Energy	<ul style="list-style-type: none"> <li>Atmospheric emissions associated with energy consumption</li> <li>Use of renewable energy</li> <li>Energy efficiency</li> <li>Increased energy costs</li> </ul>
Equal opportunities	<ul style="list-style-type: none"> <li>Creating an inclusive working environment</li> <li>Championing individuality</li> <li>Reputational and image risks</li> <li>Risk of a negative workplace climate</li> <li>Risk of loss of employees</li> </ul>
Wage equity	<ul style="list-style-type: none"> <li>Creating an inclusive working environment</li> <li>Reputational and image risks</li> <li>Risk of loss of employees</li> </ul>
Emissions	<ul style="list-style-type: none"> <li>Quantifying emissions</li> <li>Avoiding greenwashing</li> <li>Atmospheric pollution</li> <li>Reputational and image risks</li> </ul>
Employment	<ul style="list-style-type: none"> <li>Creating the best work environment</li> <li>Employee safety and stability</li> <li>Attracting new resources</li> <li>Reputational and image risks</li> </ul>
Protection of workers' rights	<ul style="list-style-type: none"> <li>Compliance with regulations</li> <li>Reputational and image risks</li> </ul>
Social impact on the local area and communities	<ul style="list-style-type: none"> <li>Consolidating relationships</li> <li>Improving employment in the local area</li> <li>Risk of complaints from the local population</li> </ul>

Transparency	<ul style="list-style-type: none"> <li>Consolidating relationships</li> <li>Improving stakeholder trust</li> <li>Risk of non-compliance with regulations</li> </ul>
Governance	<ul style="list-style-type: none"> <li>Sound business management</li> <li>Continuity of business management</li> <li>Organisational capacity</li> <li>Creating an inclusive working environment</li> <li>Risk of conflicts of interest</li> <li>Risk of non-compliance with regulations</li> </ul>
Obtaining voluntary certifications	<ul style="list-style-type: none"> <li>Value creation</li> <li>Economic investment</li> </ul>
Economic impact on the local area and community	<ul style="list-style-type: none"> <li>Spending on local suppliers</li> <li>Improving the local economic situation</li> </ul>
Collaboration with local institutions, schools and universities	<ul style="list-style-type: none"> <li>Consolidating relations</li> <li>Project creation opportunities</li> </ul>
Water	<ul style="list-style-type: none"> <li>Water consumption for production purposes</li> <li>Waste management for our machines</li> <li>Optimising water use in machinery</li> </ul>
Waste	<ul style="list-style-type: none"> <li>Reduced waste quantity</li> <li>Reuse</li> <li>Penalties for incorrect waste management</li> </ul>
External communication of commitments	<ul style="list-style-type: none"> <li>Increasing trust</li> <li>Attracting capital</li> <li>Risk of misleading communication on sustainability issues</li> <li>Reputational and image risks</li> </ul>
Supplier environmental assessment	<ul style="list-style-type: none"> <li>Reducing the company's carbon footprint</li> <li>Enhancing reputation and image</li> <li>Risk of setting excessively high standards for suppliers</li> </ul>
Ethics and integrity	<ul style="list-style-type: none"> <li>Promoting company values</li> <li>Contractual agreements</li> <li>Risk of non-compliance</li> </ul>
Non-discrimination and inclusion	<ul style="list-style-type: none"> <li>Creating an inclusive working environment</li> <li>Promoting a better internal culture</li> <li>Championing individuality</li> <li>Reputational and image risks</li> <li>Risk of loss of employees</li> </ul>

### 4.3 COMAC'S CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

The Sustainable Development Goals (SDGs) comprise 17 goals and 169 targets focused on societal and economic advancement and planet protection.

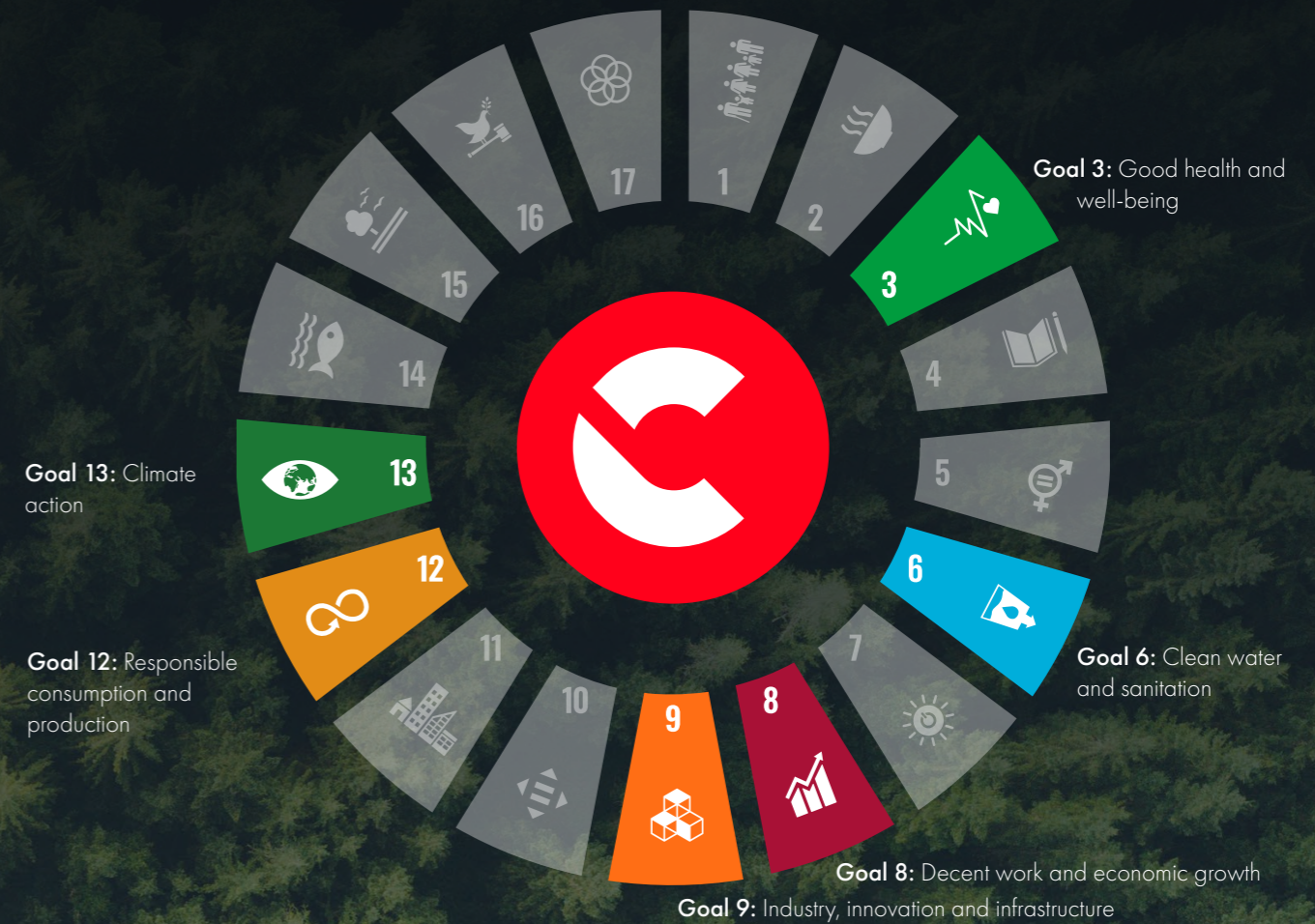
The SDGs form the 2030 Agenda for Sustainable Development, which UN member state governments adopted in 2015.

We are committed to actively contributing to the following SDGs, relevant to our business activities:



# SUSTAINABLE DEVELOPMENT GOALS

For each Sustainable Development Goal, we have identified objectives and related actions to help achieve them, and appropriate performance indicators (KPIs) to monitor progress.



Environmental Themes		Governance Themes		Social Themes	
6 CLEAN WATER AND SANITATION	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	3 GOOD HEALTH AND WELL-BEING	6 CLEAN WATER AND SANITATION
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
				12 RESPONSIBLE CONSUMPTION AND PRODUCTION	

## 5 Our commitment to the Environment

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- 5.1 Water resource management: a challenge for the future
- 5.2 Energy consumption and efficiency
- 5.3 Atmospheric emissions and our commitment to combating climate change
- 5.4 Circular economy and waste management
- 5.5 Materials: a conscious choice

6

Comac technologies designed to save water

-14%

Energy consumption

8

Comac technologies designed to save energy

-18%

Total direct and indirect emissions

-8.9%

Water consumption

-16%

Waste generated

“

*Environmental protection and safeguarding natural resources are among COMAC's primary objectives, our commitment being to preserve the abundance and beauty of nature for present and future generations and pass on the values and traditions vital to sustaining the long-term development of the human and environmental communities.*

”

All human activities, irrespective of their nature, have an impact on the environment and being aware of this is the first step towards reducing or mitigating them.

At Comac, we are aware that our activities have an impact on, for example, the use of natural resources, waste production and greenhouse gas emissions, and we are equally aware that it is up to us to adopt sustainable practices to counter these: cutting waste, boosting energy efficiency, and enhancing material recycling are just a few solutions that help us protect the environment, satisfy our customers, and secure the long-term viability of our business.

Within Comac, we are promoting a culture of corporate social responsibility that involves all our people, in an effort to develop responsible initiatives that can fit not only into their working day, but also into their daily lives. We have set ourselves an ambitious goal but we have been working hard for years to reach it.

## 5.1 WATER RESOURCE MANAGEMENT: A CHALLENGE FOR THE FUTURE

The year 2022 was a record year for drought and rainfall scarcity in Italy, confirming the need, borne out by decades of scientific studies on the subject, for policies aimed at preserving water resources through better management and innovations capable of reducing water use.

At Comac, we are fully aware of the importance of water as a precious resource and believe that this material topic is a key challenge for the future of the planet, future generations and our market sector.

Water is undoubtedly crucial in our industry, not just for the functioning of products that use it but also for the environmental impact they create: water is the driving force behind clean and hygienic environments, and is vital for our products to work well; at the same time, we acknowledge our duty to use water efficiently and sustainably, which is why we design our machines to use as little water as possible without compromising on cleaning performance.



#comac4water

Our ongoing commitment to a concrete change in the way water is used by our products goes back a long way, through careful research that has led to the development of a series of innovations aimed at improving water efficiency.

As proof of this commitment, Comac has been certified by the Water Technology List, managed by the British government department DEFRA (Department for Environment, Food and Rural Affairs), which promotes and certifies products that enable reductions in water consumption.

## COMAC SOLUTION CARE: comac's innovation for saving water and solution



### NON-STOP CLEANING

This technology enables floor-scrubbing water to be recycled, cutting the environmental impact of cleaning. This highly innovative system makes it possible to reuse dirty water for up to a week.



### REWATER

Comac scrubbing machines equipped with ReWater technology re-use the water already used during scrubbing tasks. There are two filtering systems: one two-phase and one four-phase. Two-phase Rewater is the Comac technology that uses a mechanical filtering system to allow the machine to work with the recycled water. Four-phase Rewater is a more advanced system that provides cleaner water recycled by means of a dual mechanical filtering action and a separation phase for decanting, maintaining constant cleaning results.



### CDS

CDS is the water and detergent dosing system designed by Comac that saves up to 50% water and detergent by reducing waste. It lets the operator measure out water and detergent independently with two distinct selectors: This means you can quickly adjust the amount of solution to match the specific dirt, avoiding the excess found in traditional scrubbing machines.



### STOP&GO

If the machine stops momentarily, the brushes stop and the delivery of the solution stops; furthermore, on automatic machines, the brush head is lifted off the floor with no need for operator intervention, so that consumption is optimised and waste reduced. Pressing the forward movement pedal or levers restores the functions that were active previously.



### CONSTANT SOLUTION FLOW

Since in machines with dual brushes it is possible that poor distribution of the solution on the brushes may occur, for machines without a solution pump Comac has designed a distributor with differentiated flow sections that ensures the correct delivery of the solution on both brushes, improving effectiveness even in the case of low flow rates.



### SSC

This is the Comac technology that enables the intelligent connection of the solution pump to the drive motor of the scrubbing machines. This means that if the scrubbing machine operates at reduced speed, the solution flow automatically decreases so as to reduce waste, save solution and maintain constant performance.


Since we started calculating the carbon footprint of our products, we have also started monitoring water consumption in our factories. The water used by Comac S.p.A. comes entirely from surface water treatment in an area (Verona) identified as

having an overall medium-low water risk. In 2022, we implemented the internal water recycling system also for the testing of larger machines (characterised by larger tanks), thus considerably reducing the use of water resources compared to the previous year.

Water withdrawals	2021	2022
Total (m <sup>3</sup> )	6,432	5,860

To minimise the impact on water resources, the entire Comac facility utilises a closed-loop water system, with the exception of water designated for domestic purposes. The company has implemented an activated carbon filtration system to enable the recirculation of water utilised in assembly lines and for testing machinery. Consequently,

there are no industrial discharges, nor is there a need to treat potentially hazardous substances released into the water. In the area of water usage, we have pinpointed the following objective along with the associated actions to accomplish it:

SDG Goal	Goal	Actions
 <p>6 CLEAN WATER AND SANITATION</p>	Comac is dedicated to fostering water stewardship, both internally within the company and externally through the technologies incorporated into its products.	<ul style="list-style-type: none"> <li>Reduction of water usage associated with production processes.</li> <li>The development of technological innovations, such as the Non-Stop Cleaning System and Rewater, enables the recycling of water used in floor scrubbing machines.</li> </ul>

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: m<sup>3</sup> of water consumed per unit produced.

## 5.2 ENERGY CONSUMPTION AND EFFICIENCY

Comac's dedication to environmental stewardship is evident in the design and production of machines that allow users to consume less electricity. The efficiency systems installed in Comac's products enable them to

operate with increased autonomy, thereby reducing the frequency of energy recharging required. The various machines also offer a range of programmes designed to decrease energy consumption.





# COMAC ENERGY CARE: Comac's energy-saving technologies



## ECO MODE

With a single button press, energy consumption and machine noise can be simultaneously reduced. This setup is perfectly suited for energy conservation whilst enhancing operational independence.



## PRESSURE MONITORING

Constantly monitors the power dispensed by the brush motors in order to guarantee maximum effectiveness on any type of flooring.



## INTELLIGENT PRESSURE MONITORING

The Intelligent Pressure Monitoring (IPM) weight sensor equips the operator with a consistent and precise measurement of the pressure applied by the scrubbing-machine brushes.



## STOP&GO

When the machine is temporarily at a stop, the functions are interrupted automatically. In floor scrubbers, for example, the brushes are halted and the solution flow is interrupted. Furthermore, on automatic machines, the brush head is lifted off the floor with no need for operator intervention, so that consumption is optimised and waste reduced.

Pressing the forward movement pedal or levers restores the functions that were active previously.



## PROGRAM SELECTOR

The working program selector enables the operator to manually select the type of activity to be carried out. For instance, on the C130 model, users can select from various programmes using a touch screen display: ECO, STANDARD and PLUS.

Each machine is designed to utilise precise quantities of water, detergent, and pressure, enabling efficient operation across varying degrees of soiling. This approach prevents waste, conserves water, minimises consumption, and enhances cleaning effectiveness as required.



## LITHIUM BATTERIES

Machines powered by lithium batteries experience minimal self-discharge, thereby preserving their energy levels more effectively over time. They can be utilised multiple times within the same day due to the rapid charging capability, which also results in reduced energy consumption from the power grid.



## LED LIGHTING

The energy savings achieved thanks to the use of LED technology are significant, with up to 80% less energy used than with standard bulbs.



## HYBRID

The hybrid technology enables the operator to switch from petrol power to battery power, guaranteeing up to 7.5 hours of continuous work (CS60). This technology enables reduced consumption and shorter recharging times. The batteries are charged automatically when the gasoline motor is used.

We document the annual energy consumption of our facilities in the "Management Review - Integrated Quality, Environment, Safety Management System" report. The consumption data are derived from invoices that have been received, filed, and made accessible for review by the Administrative Office.

Energy consumption during the two-year period 2021-2022 was mainly due to the use of natural gas for production processes and diesel and petrol for operating company vehicles, as well as for testing our products. In total, fuels totalling 5.78 TJ in 2021 and 5.23 TJ in 2022 were used.

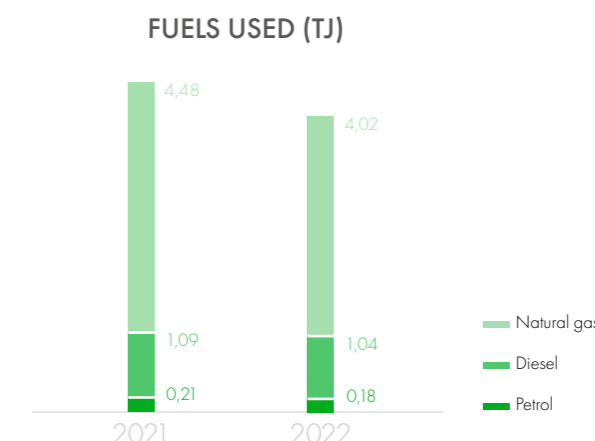


Figure 1: Comparison of fuels used in Comac in 2021 (left) and 2022 (right), expressed in TJ and distinguished between natural gas, diesel and petrol.

Natural gas consumption in 2022 decreased by 11% compared to 2021. This reduction, clearly due to the fall in production, was also driven by increased efficiency in heat usage: The reference KPI dropped from 8.99 to 8.77 (Sm<sup>3</sup> per unit produced), a decrease of roughly 2%.

Fuels other than natural gas, i.e. diesel and petrol, are used both for the movement of all company vehicles and for testing our products. Also on this front, there was a decrease in consumption in 2022 compared to 2021 due to less travel activity.

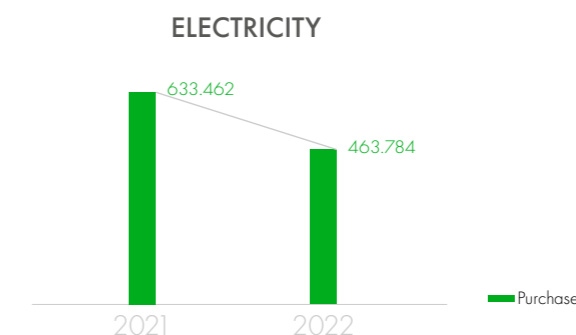



Figure 2: Total electricity purchased by Comac in 2021 (left) and 2022, expressed in kWh. In the graph, the grey trend line indicates a year-on-year decrease in the amount of energy purchased.

In 2021, we bought 633,462 kWh of energy, and in 2022, this figure dropped to 463,784 kWh. Regarding electricity consumption, it is crucial to highlight the significant reduction in the KPI, which has decreased from 44.80 to 35.80 kWh per unit produced, marking a 20% reduction. This is undoubtedly a result of our targeted efforts and initiatives in this area.

Comac's energy consumption figures are summarised below.

Type	2021	2022	Change
<b>Non-renewable energy sources</b>			
Natural gas (TJ)	4.48	4.02	-11%
Diesel (TJ)	1.09	1.04	-4%
Petrol (TJ)	0.21	0.18	-13%
<b>Electricity purchased from the grid</b>			
Electric energy (TJ)	2.28	1.67	-1%
Of which from renewable sources (with GO)	0	0	
<b>TOTAL ENERGY CONSUMPTION</b>	<b>8.06</b>	<b>6.90</b>	<b>-14%</b>

In the domain of energy consumption, we have identified the following goal along with the associated actions to accomplish it:

SDG Goal	Goal	Actions
 <b>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</b>	Comac is committed to enhancing its infrastructure to ensure sustainability, focusing on greater efficiency and resource conservation. The company is dedicated to promoting the use of clean, eco-friendly technologies and adopting industrial processes that have a reduced environmental impact.	Energy efficiency initiatives have led to the replacement of traditional lighting systems with energy-efficient LED lighting.

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: kWh of electrical energy consumed per unit produced.

We understand that sustainability is a continuous journey, with ever-evolving challenges to confront. Therefore, we will keep investing in new technologies and solutions to enhance our performance further. Our future strategies and actions will be steered by our unwavering commitment to minimising our environmental footprint.

### 5.3 ATMOSPHERIC EMISSIONS AND OUR COMMITMENT TO COMBATING CLIMATE CHANGE

Climate change represents the most significant environmental challenge of our era. Each of us can and should play a tangible role in mitigating and combating climate change, beginning with the reduction of emissions.

At Comac, we are determined to reduce our greenhouse gas emissions, recognising that the first step towards improvement is to understand and, most importantly, to quantify our impacts.

Consequently, we have initiated the process of quantifying the carbon footprint of several of our products by employing the Life Cycle Assessment (LCA) methodology. This approach evaluates the entire life cycle of a product "from cradle to grave", encompassing the extraction of raw materials through to the usage and eventual disposal of the finished product. Our dedication has led to the award of the CFP Systematic Approach certificate for a range of Comac's new scrubbing machines. Bureau Veritas issued this certificate under the ISO 14067:2018 standard.

This process, requiring a detailed review of our production processes and supply chain, now allows us to provide our customers with authentic, certified information on the environmental impact of the scrubbing machines we make.

#### CARBON FOOTPRINT ITALY (CFI)

In 2020, we enrolled in the Carbon Footprint Italy (CFI) programme, the Italian operator for carbon management established to transparently report the greenhouse gas (GHG) emissions associated with products and organisations.



Within our organisation, we have calculated both direct emissions (Scope 1) and indirect emissions (Scope 2). In terms of direct CO<sub>2</sub> equivalent emissions, the primary source is the consumption of methane gas for heating and processing. Meanwhile, Scope 2 indirect emissions stem from the use of electricity procured from the grid. These are quantified using both the Location-Based and Market-Based methods<sup>[2]</sup>.

Below is the data report for 2022.

[2] For the calculation of Scope 1 emissions, the factors used for the years 2021 and 2022 respectively are those published by the Department for Business, Energy & Industrial Strategy (BEIS). In calculating Scope 2 emissions, the reporting standard employed (GRI Sustainability Reporting Standards 2016) offers two distinct approaches: "Location-based" and "Market-based". The location-based method utilises average emission factors that correspond to the specific energy mixes of national power generation; the "Supplier Mix" emission factor was used for this approach. The market-based approach uses emission factors that are contractually defined with the electricity supplier. Without specific contracts between the organisation and the power provider (such as buying Guarantees of Origin), we used the national "residual mix" emission factor for the market-based method. The references used are those published by the Association of Issuing Bodies (AIB) pertaining to the years 2021 and 2022. Scope 2 emissions are reported in tonnes of CO<sub>2</sub>. However, the contribution of methane and nitrous oxide to overall greenhouse gas emissions (CO<sub>2</sub>e) is negligible, as the relevant technical literature suggests.

Type of emissions	Unit of measure	2021	2022
Scope 1		346	315
Scope 2 - Location Based	tCO <sub>2</sub> e	226	166
Scope 2 - Market Based		289	212

Our results indicate a 9% reduction in direct emissions (Scope 1) and a 32% reduction in indirect emissions (Scope 2). Consequently, the total direct and indirect (location-based) emissions fell from 572 tCO<sub>2</sub>e in 2021 to 469 tCO<sub>2</sub>e in 2022, marking an 18% decrease. This reduction was partly due to a decline in production; however, it was also a result of enhanced efficiency in both heating and electrical consumption.

In line with our dedication to tackling climate change, we have identified the following goal and associated measures to accomplish it:

SDG Goal	Goal	Actions
13 CLIMATE ACTION	Respond to the increasing demands of stakeholders seeking to understand the impact of products in order to make more informed decisions regarding climate change.	Calculate and communicate the carbon footprint of their scrubbing machines.

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: number of manufactured products whose climate footprint we have calculated using the CFP – Systematic Approach.

Over the next three years, we also aim to compile an inventory of greenhouse gas (GHG) emissions in accordance with ISO 14064-1 and to have it verified by an independent third party.

## 5.4 CIRCULAR ECONOMY AND WASTE MANAGEMENT

Our efforts to mitigate our environmental impact have necessitated a long-term perspective and a holistic approach, where the management of resources and waste is of paramount importance.

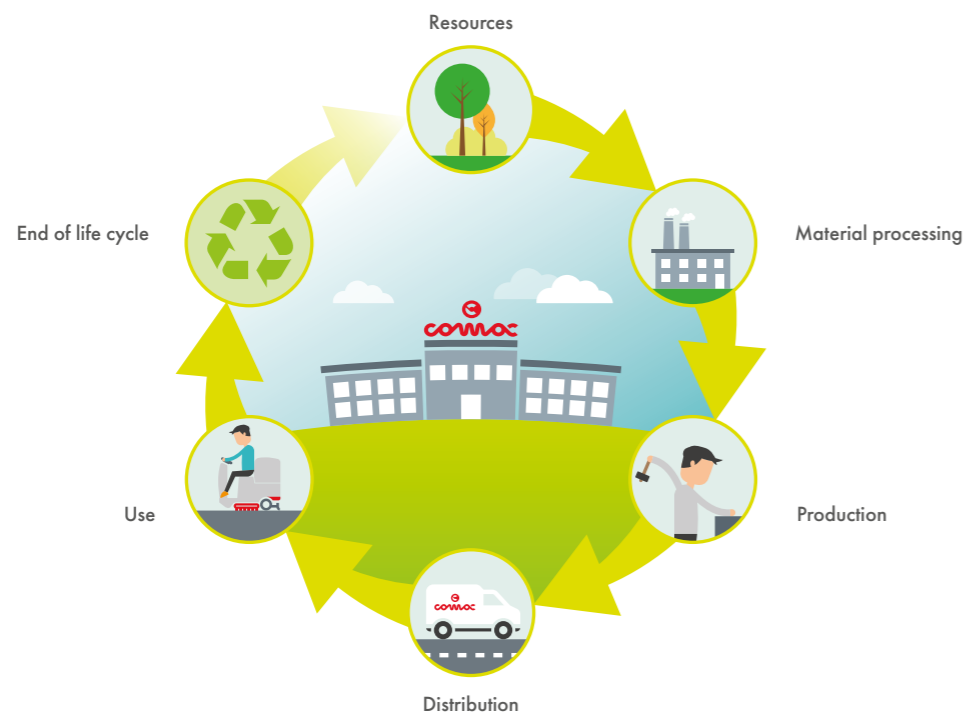
At Comac, we are committed to the principles of the circular economy and endeavour to minimise waste in our manufacturing processes, enhancing efficiency. We are continually seeking innovative solutions to enhance the recyclability of our products, starting from the design phase to minimise their environmental impact.

### COMAC'S CIRCULAR ECONOMY

The circular economy represents a novel strategy designed to disrupt the conventional linear model of production and consumption, establishing a system where materials and resources are used efficiently, thereby minimising waste and mitigating environmental impact.

The circular economy champions the ethos of "reduce, reuse, recycle", moving away from the linear model of production, consumption, and disposal. The focus is on intelligently designing products that can be repaired, remanufactured, or reused at the end of their initial life cycle. This approach prevents the squandering of resources and mitigates the environmental consequences associated with the extraction of new raw materials.

Our dedication to reducing waste is clear from the very outset of the design process for Comac machinery, beginning with the selection of recyclable components. Indeed, we have set ourselves the objective of furnishing the end user with comprehensive information regarding the recyclability and disposal of our machines. This initiative is designed to ensure that consumers actively participate in the responsible life cycle management of our products, whilst maintaining their high quality. Our Recycling Manual is the essential tool enabling us to direct our customers and end-user operators towards the proper disposal of our machines. The manual explains the different components and how to recycle them following regulations. We make sure materials like iron, rubber, wires, electronic circuit boards, motors, and batteries are recyclable and disposable, thus creating new, usable materials. In the Manual, we also offer guidance on the appropriate disposal of the paper or wooden materials that constitute our packaging.



## WASTE MANAGEMENT

Our environmental goals include using fewer resources in our manufacturing processes and reducing the waste they produce. Our company actively encourages waste sorting on-site and handles a variety of hazardous and non-hazardous waste. We also start the recycling process, turning waste into a valuable resource that serves as a secondary raw material.

In 2022, we succeeded in reducing our waste production by 16%, from 243.15 tonnes in 2021 to 204.02 tonnes in 2022. This decrease was observed in both non-hazardous waste, which fell from 218.02 tonnes in 2021 to 200.35 tonnes in 2022, and hazardous waste, which saw a significant reduction from 25.13 tonnes in 2021 to 3.67 tonnes in 2022.

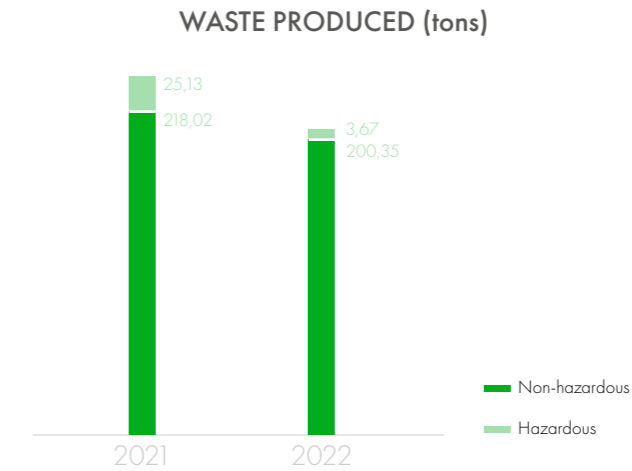


Figure 3: Total waste produced by Comac in 2021 (left) and 2022 (right), differentiated into non-hazardous waste, shown in dark green, and hazardous waste, represented in light green.

In line with efforts to reduce waste, we are working to steer most of it away from disposal, focusing on recycling. For instance, by sorting nylon from mixed rubbish, we managed to cut down on both its volume and, as a result, the trips required to haul it away. Furthermore, this initiative has allowed us to recycle 211.15 tonnes of waste in 2021, representing 87% of the total waste for that year, and 193.95 tonnes in 2022, which is 98% of the year's total waste, markedly enhancing our performance compared to the previous year. The remaining quantities of waste were allocated for disposal: partly to biological treatment (31 tonnes in 2021 and 9.47 tonnes in 2022) and partly to preliminary storage (1.01 tonnes in 2021 and 0.60 tonnes in 2022).



Figure 4: Representation of Comac's waste management for the year 2021 (above) and 2022 (below).

### 306 - 3 WASTE GENERATED

EWL Code	Units	2021			2022		
		Hazardous	Non-hazardous	Total	Hazardous	Non-hazardous	Total
15.01.03	kg	-	49,590.00	49,590.00	-	62,100.00	62,100.00
15.01.03	kg	-	-	-	-	-	-
15.01.01	kg	-	4,354.00	43,540.00	-	52,510.00	52,510.00
15.01.06	kg	-	23,160.00	23,160.00	-	14,140.00	14,140.00
15.01.06	kg	-	-	-	-	-	-
20.03.03	kg	-	44,680.00	44,680.00	-	18,020.00	18,020.00
17.04.05	kg	-	33,260.00	33,260.00	-	30,845.00	30,845.00
17.04.05	kg	-	-	-	-	-	-
16.06.01*	kg	300.00	-	300.00	1,513.00	-	15,13.00
16.10.02	kg	-	-	-	-	-	-
15.02.02*	kg	1,938.00	-	1,938.00	827.00	-	827.00
16.10.02	kg	-	13,085.00	13,085.00	-	10,070.00	10,070.00
17.04.11	kg	-	434.00	434.00	-	570.50	570.50
15.01.10*	kg	197.00	-	197.00	277.00	-	277.00
15.01.02	kg	-	920.00	920.00	-	8,760.00	8,760.00
16.01.22	kg	-	-	-	-	-	-
15.01.11*	kg	61.00	-	61.00	79.00	-	79.00
08.03.18	kg	-	66.00	66.00	-	73.00	73.00
16.02.16	kg	-	765.00	765.00	-	535.50	535.50
13.05.07*	kg	-	-	-	-	-	-
16.10.01*	kg	1,580.00	-	1,580.00	-	-	-
16.02.13*	kg	2,023.50	-	2,023.50	360.00	-	360.00
12.01.09*	kg	189.00	-	189.00	71.00	-	71.00
13.05.07*	kg	18,840.00	-	18,840.00	-	-	-
16.01.22	kg	-	102.00	102.00	-	364.00	364.00
16.02.14	kg	-	3,597.00	3,597.00	-	-	-
20.03.07	kg	-	4,680.00	4,680.00	-	-	-
13.02.08*	kg	-	-	-	451.00	-	451.00
16.01.07*	kg	-	-	-	35.00	-	35.00
16.05.05	kg	-	139.00	139.00	-	-	-
20.01.21*	kg	6.00	-	6.00	-	-	-
16.01.14*	kg	-	-	-	58.00	-	58.00
16.06.05	kg	-	-	-	-	149.00	149.00
17.02.03	kg	-	-	-	-	21,50.00	2,150.00
17.04.01	kg	-	-	-	-	8.00	8.00
17.04.02	kg	-	-	-	-	51.00	51.00
<b>TOTAL</b>		<b>25,134.50</b>	<b>218,018.00</b>	<b>243,152.50</b>	<b>3,671.00</b>	<b>200,346.00</b>	<b>204,017.00</b>

### 5.5 MATERIALS: A CONSCIOUS CHOICE

At Comac, we firmly believe that a sustainable approach to natural resource management is essential to reduce environmental impact and preserve our planet. As we are committed to reducing the environmental impact of our products from the very outset, we continuously seek materials that offer a lower environmental footprint for our production processes.

Drawing on our decades of experience in manufacturing floor cleaning machines, we have honed our ability to optimise the use of raw materials and minimise waste, thereby enhancing the efficiency of our production processes. By embracing innovation and integrating the best available technologies, we strive to optimise the value of the resources we utilise. Our approach prioritises the selection of the most environmentally friendly options, with a preference for materials that are recycled, recyclable, or derived from renewable sources.

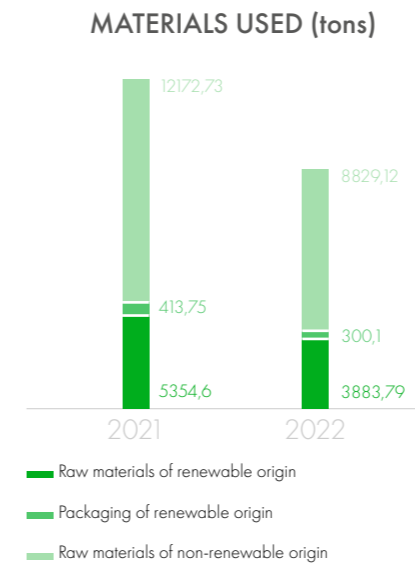


Figure 5: Quantities of raw materials and packaging used in the years 2021 (left column) and 2022 (right column), categorised by origin type: renewable and non-renewable.

In the area of responsible and aware use of resources, we have identified the following objective and related actions to achieve it:

SDG Goal	Goal	Actions
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Promoting the responsible use of resources employed in Comac's manufacturing processes to embrace a circular methodology, reducing waste production via recovery and recycling initiatives, and seeking to curtail the consumption of virgin raw materials.	<ul style="list-style-type: none"> <li>Sustainable management and the efficient use of natural resources.</li> <li>The company has laid out plans to achieve "plastic-free" status.</li> <li>Promotion of renewable energy use and energy efficiency.</li> <li>Recycling manual</li> </ul>

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: kg of renewable material used per unit produced.

We are pleased with the results we have achieved through the adoption of recycled input materials in our product range. Using recycled materials has helped us cut our reliance on virgin resources and actively feed into the raw material loop.

In 2021, we used 17,941.08 tonnes of raw materials, a figure that fell to 13,013.01 tonnes in 2022. Given that roughly 50% of the materials from the machine at the end of its life can come from renewable sources, we found that in 2021 we used 5,768.35 tonnes of renewable materials, and in 2022 the figure was 4,183.90 tonnes. This includes not only the raw materials for machine assembly, which totalled 5,354.60 tonnes in 2021 and 3,883.79 tonnes in 2022, but also the packaging materials, weighing 413.75 tonnes in 2021 and 300.10 tonnes in 2022.

In 2022, no products or their packaging were recovered. While these calculations are approximations, we have grounded them in the recyclability data accessible through Comac's Carbon Footprint Protocol (CFP) model. We chose the C85 machine as our reference because it represents the average size of Comac's products. We then multiplied the data we gathered by the total number of units sold over two years.

We acknowledge that there is still a significant amount of work ahead. We will keep raising our standards, striving for more improvements, bettering our data monitoring and seeking new ways to lessen our environmental impact.

## 6 Our commitment to People

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- 6.1 The employee community (employment, freedom of association and bargaining)
- 6.2 Occupational health and safety
- 6.3 Internal and external training
- 6.4 Gender equality
- 6.5 Ethics and integrity
- 6.6 Non-discrimination and inclusion

31

New hires

+51%

Average total training hours

22%

of Comac's workforce are female

73%

of training hours on technical topics

45%

of new hires are aged under 30

“

COMAC is committed to motivating its employees and maintaining its reputation as an excellent company to work for. The Company's working environment reflects its belief that all employees must show trust in each other, as well as respect and concern for the safety and well-being of everyone.

”

At Comac we are convinced that People are our most valuable assets and that the success of our company depends first and foremost on the energy and enthusiasm of those who currently work or have worked in our company in the past. For this reason, we regard the people of Comac as one of the foundational pillars of our company make-up.

Consequently, we have consistently shown respect, inclusion, and recognition of merit to the individuals within our community, providing fair and dignified working conditions that accommodate the needs of all.

In 2021, we sought to demonstrate our dedication by embarking on a journey towards achieving SA8000 certification, which pertains to Social Responsibility. This certification process encompasses the realm of employee conditions and advocates for ethical and equitable treatment. The certification demonstrates that at Comac, we adhere to an ethical production cycle focused on reinforcing the rights of all individuals involved.

The commitments we have undertaken through our voluntary adherence to SA8000 certification are embedded in our Integrated Corporate Policy, which reflects our ambition to embed the principles of corporate social responsibility deeply within Comac's ethos.

## 6.1 THE EMPLOYEE COMMUNITY (EMPLOYMENT, FREEDOM OF ASSOCIATION AND BARGAINING)

We aim to motivate our staff by fostering a work environment filled with well-being, trust, and respect among all at Comac, along with a strong commitment to everyone's safety and welfare. In doing so, we reinforce our standing as an exemplary employer, a sentiment that is echoed by our external stakeholders.

At COMAC, we respect the individuality, dignity and value of each employee and ask our employees to do the same, striving to create and maintain a Working Environment that encourages, recognises and develops the creativity and productivity of each individual. In our Code of Ethics, we have outlined the commitments we make to our community of employees:

- offering a safe, healthy working environment;
- creating and maintaining an environment that is free from any type of discrimination or harassment;
- providing employees with direct, timely information;
- respecting the privacy of employees, including their right to the confidential processing of personal data, in line with current laws and regulations.

All staff are required to familiarise themselves with the Code and with the other policies of the Company, either existing or issued in the future, and they must uphold the values, objectives and commitments outlined in these documents.

We consistently ensure that our employees are informed about our commitments to sustainable development by communicating updates through the Zucchetti HR portal, the corporate website, and Comac's official blog.

In 2022, the Comac community expanded, as the number of employees rose by 5.2% compared to 2021, growing from 174 to 183<sup>[1]</sup>. This growth confirms Comac's status as a robust company with a stable workforce.

[1] Number of employees as at 31/12/2022. Head count method.

### Employment data

#### CHANGE IN THE NUMBER OF EMPLOYEES COMPARED TO 2021

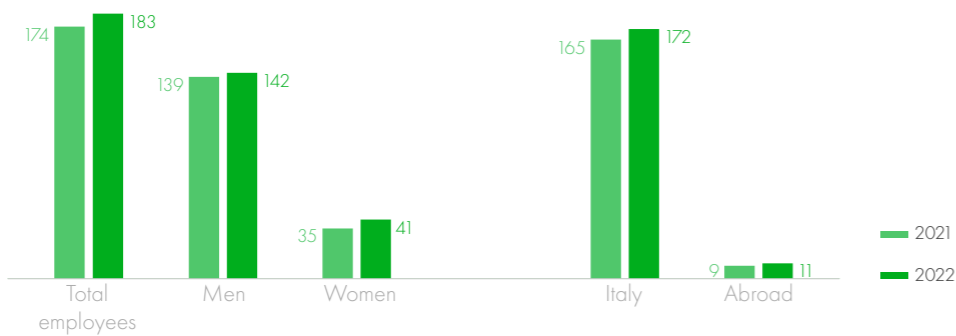


Figure 6: change in the number of employees between 2022 and 2021, broken down by gender and geographical area.

The rise predominantly impacted the female segment of the workforce, which grew from 35 employees in 2021 to 41 in 2022, representing 22% of Comac's entire workforce. The total number of male employees is 142.

#### EMPLOYEES BY GENDER IN 2022

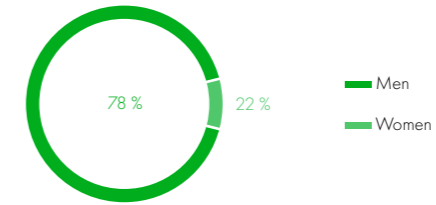


Figure 7: number of employees by gender.

#### EMPLOYEES BY GEOGRAPHICAL AREA IN 2022

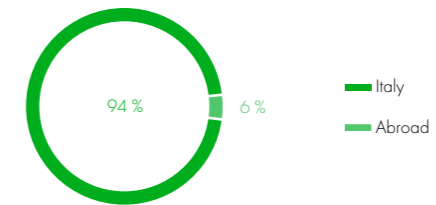


Figure 8: number of employees per geographical area.

#### EMPLOYEES BY AGE GROUP IN 2022

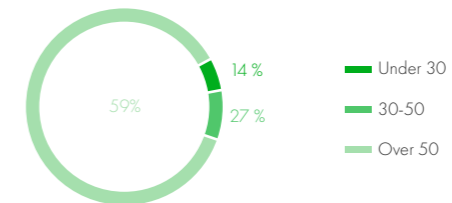


Figure 9: number of employees by age



The majority of our workforce falls within the 30-50 age bracket, representing 59%, whilst 27% of our employees are over the age of 50, and the remaining 14% are under 30 years old.

In 2022, there were 31 new hires, an increase from the 11 in 2021, set against 22 employment terminations.

Forty-five percent of the new hires are young individuals under the age of 30, yet a substantial proportion (39%) is also accounted for by those aged between 30 and 50. Meanwhile, 16% of the new recruits fall into the over-50 age category.

Regarding job terminations, 18% involved individuals under 30, whereas both the 30-50 age bracket and the over-50s group constituted 41% of the departures, respectively. Retirements represented 44% of departures among those aged over 50.

### NEW HIRES IN 2022, BROKEN DOWN BY GENDER AND AGE GROUP

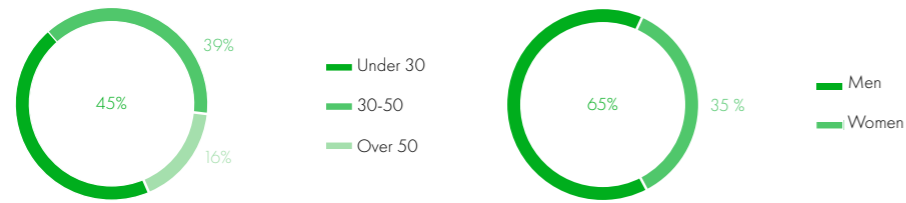


Figure 10: breakdown of new hires by gender and age.

### TERMINATIONS OF EMPLOYMENT IN 2022 BROKEN DOWN BY GENDER AND AGE GROUP

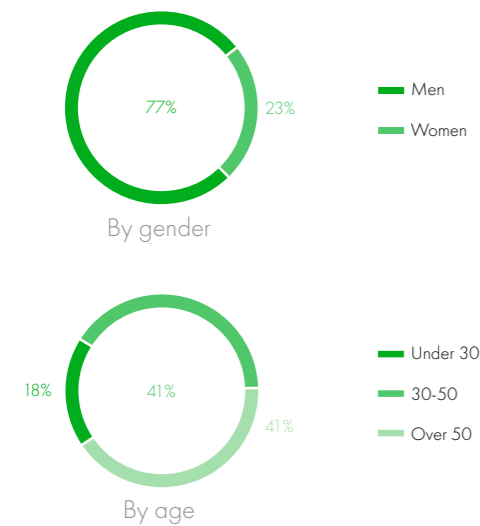
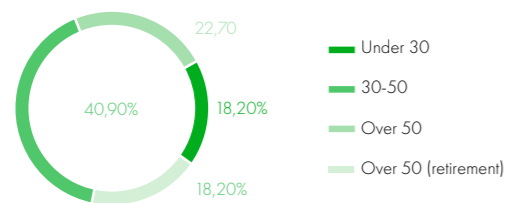


Figure 11: breakdown of terminations of employment by gender and age.



### Turnover

	2021 TURNOVER	2022 TURNOVER
<b>By gender</b>		
Men	9.35%	11.97%
Women	2.86%	12%
<b>TOTAL</b>	<b>8%</b>	<b>12%</b>
<b>By age</b>		
<30	13%	16%
30-50	7%	8%
>50	8%	18%
<b>TOTAL</b>	<b>8%</b>	<b>12%</b>

The turnover figures underline what has already been stated elsewhere in this report. The higher turnover among our female staff attests to our dedication to bolstering the representation of women at Comac, coinciding with the overall growth in our workforce. Regarding age demographics, the growth within the under-30 category suggests that a significant number of young individuals have been recruited. The participation rate for the 30-50 age group remained largely unchanged, whereas the increase observed in the over-50 age group can also be attributed to the number of retirements.

It is worth noting that the average length of service at Comac is 14.90 years.

### EMPLOYEES BY TYPE OF CONTRACT IN 2022

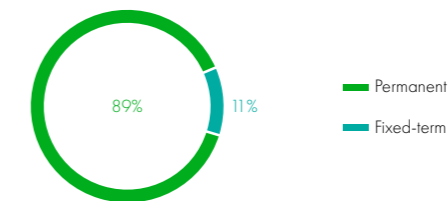


Figure 12: number of employees by employment contract (permanent and fixed-term).



### CHANGE IN THE NUMBER OF FIXED-TERM CONTRACTS COMPARED TO 2021

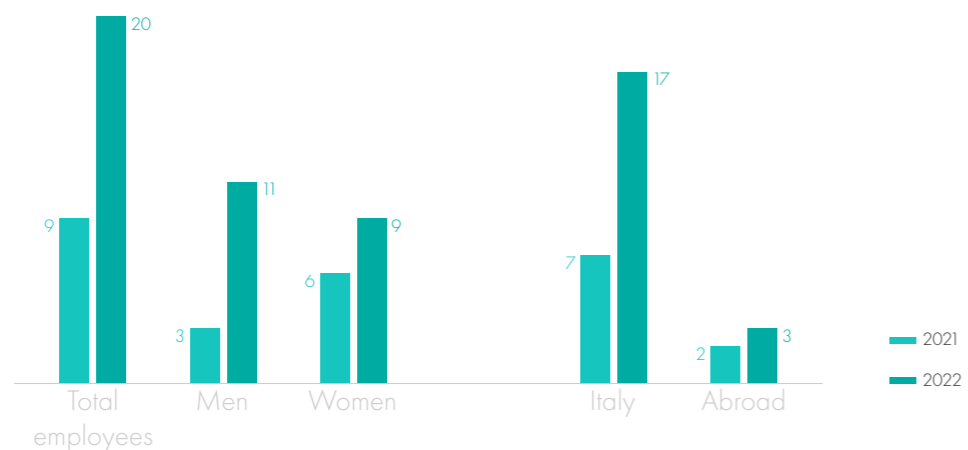


Figure 13: change in the number of fixed-term contracts between 2022 and 2021, broken down by gender and geographical area.

The number of fixed-term contracts rose from 9 in 2021 to 20 in 2022. Fixed-term contracts are designed to facilitate the transition towards permanent employment.

### CHANGE IN THE NUMBER OF PERMANENT CONTRACTS COMPARED TO 2021

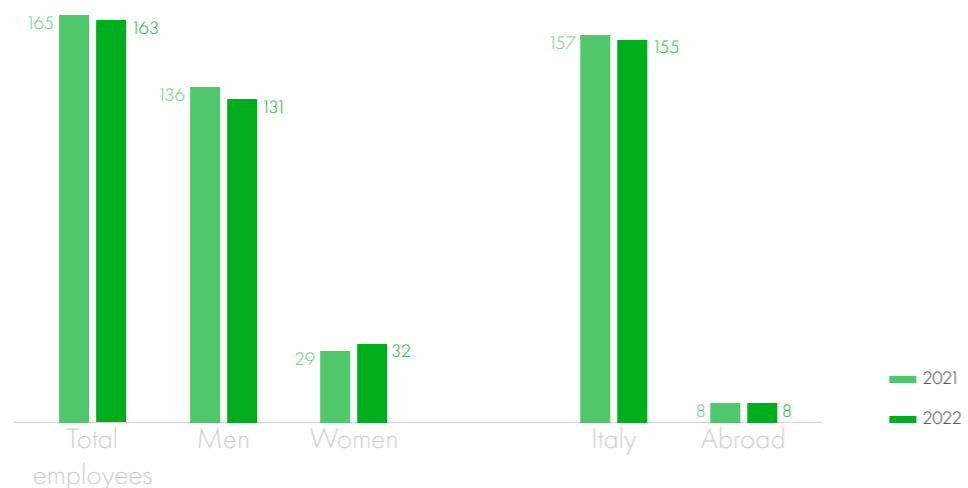


Figure 14: change in the number of permanent contracts between 2022 and 2021, broken down by gender and geographical area.

In 2022, there was a 1.2% reduction in the number of employees on permanent contracts compared to 2021. Permanent contracts continue to be the predominant form of employment at Comac, encompassing 163 of the 183 employees, which represents 89% of the workforce.

### EMPLOYEES BY TYPE OF WORKING TIME IN 2022

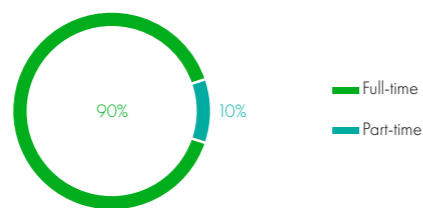


Figure 15: number of employees by type of work (full-time and part-time).

### CHANGE IN THE NUMBER OF FULL-TIME CONTRACTS COMPARED TO 2021

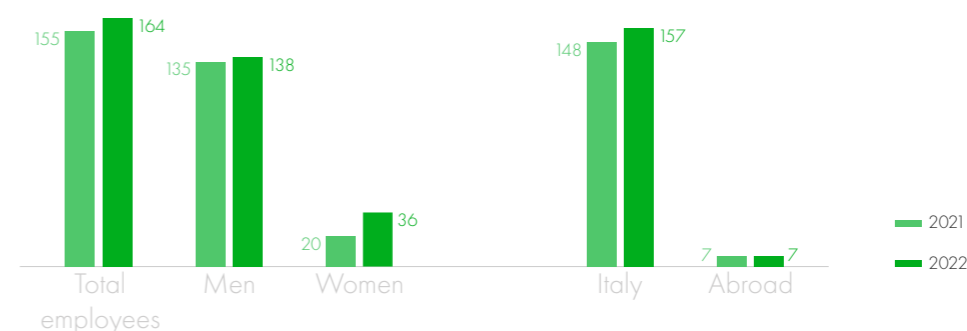


Figure 16: change in the number of employees with full-time employment contracts between 2022 and 2021, by gender and geographical area

### CHANGE IN THE NUMBER OF PART-TIME CONTRACTS COMPARED TO 2021

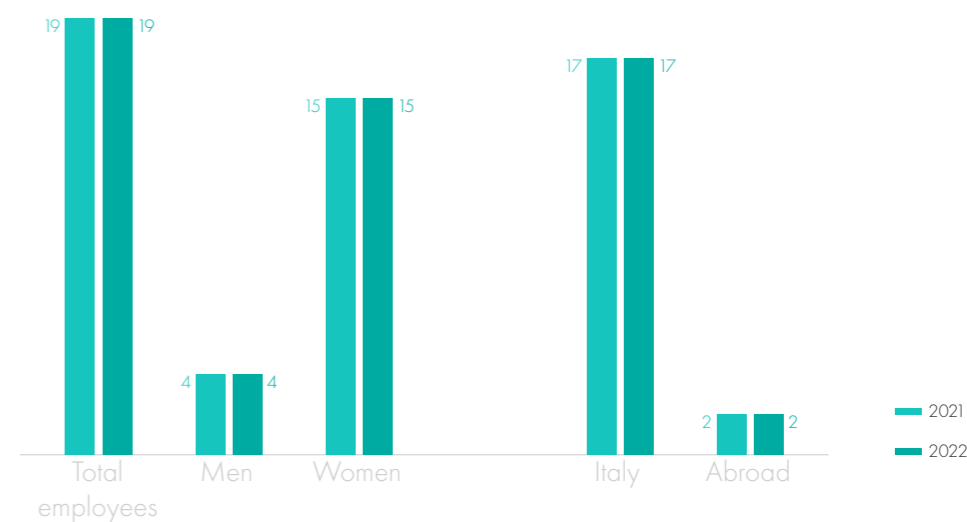


Figure 17: change in the number of employees with part-time employment contracts between 2022 and 2021, by gender and geographical area

In comparison to 2021, the proportion of part-time employment contracts has remained stable at 10% of the total workforce. Concurrently, there has been a rise in the number of employees over the past year, which has been accompanied by a corresponding increase in full-time employment contracts, now constituting 90%.

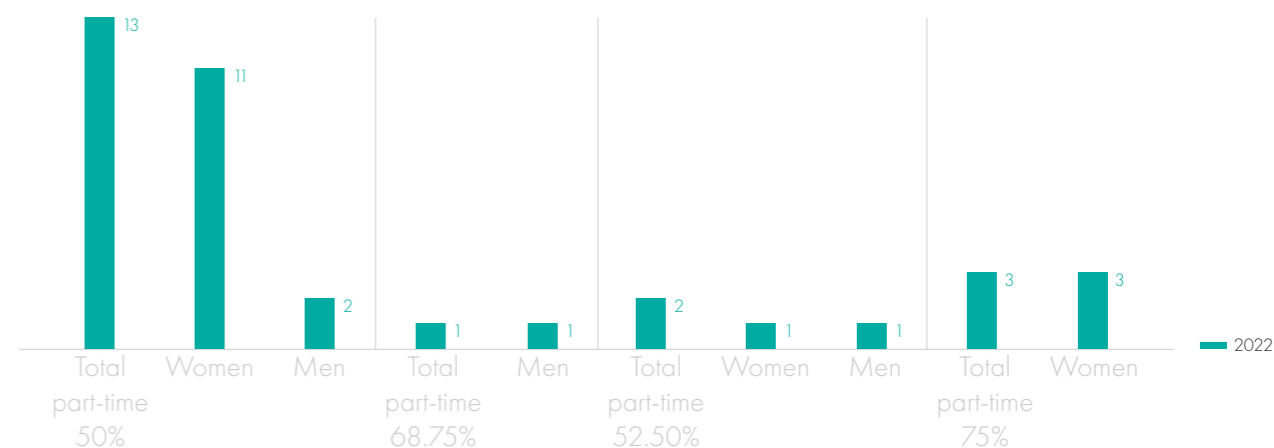


Figure 18: composition of employees with part-time employment contracts, broken down by type of part-time and gender.

All of Comac's employees are encompassed by the National Collective Labour Agreements. We adhere to the provisions stipulated in collective bargaining agreements and current employment laws regarding the management approach on work, working hours, various types of leave, including sick leave and holidays, disciplinary actions, contractual status, and the calculation of wages.

In accordance with the National Collective Labour Agreement (CCNL), we acknowledge the provision of welfare instruments valued at €200, which employees can utilise by May of the subsequent year. Additionally, we contribute to the mètaSalute health fund for employees within the metalworking sector, for the advantage of all our staff members.

Additionally, to extend financial assistance, Comac subsidises 80% of the cost for each employee's meal at the company canteen – a result of internal second-level negotiations with workers' representatives.

Meanwhile, Comac's executives receive benefits as outlined in the 2019-2023 Executive-Industry Contract, along with remuneration that includes a fixed component exceeding the minimum salaries stipulated by the Contract. Additionally, there is a variable component tied to targets established in agreement with the Chairman.

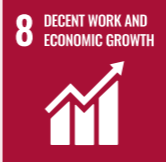
The annual salary of the highest-paid individual at Comac is 19 times greater than the average annual salary of all Comac employees.

In its Code of Ethics, Comac additionally affirms the company's commitment to supporting trade union activities. We acknowledge the importance of the freedom of association and the right to free and independent collective bargaining, ensuring that all employees, without exception, have the right to join or form a trade union of their choice. We also ensure that workers' representatives have the ability to perform their representative duties in the workplace without experiencing any discrimination.

During the reporting period, we did not identify any activities connected to Comac or its suppliers that posed a risk to the freedom of trade union association (GRI 407).

We have included in our Integrated Corporate Policy a commitment not to use, even indirectly, either forced and/or compulsory labour or child labour, in accordance with the provisions of the applicable standards dictated by the International Labour Organisation (ILO).

In our commitment to decent work, we have set the following goal and corresponding actions to attain it:

SDG Goal	Goal	Actions
	At Comac, we strive to foster a healthy, safe, and fair workplace for everyone. Our aim is to nurture, acknowledge, and enhance the creativity and productivity of each person.	<ul style="list-style-type: none"> <li>• Continuous training.</li> <li>• Employee Engagement in Social Responsibility Initiatives.</li> </ul>

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: employee turnover rate.



## 6.2 OCCUPATIONAL HEALTH AND SAFETY

Our Integrated Policy reflects Comac's pledge to provide safe and suitable work environments, safeguard staff health and well-being, prevent accidents, and protect against health hazards during their work.

Our Management System, built on ISO 45001 standards, lets us constantly track safety data. With clear procedures and assigned roles, we ensure every employee's health and safety. We take every step necessary to prevent accidents.

Our Management System fosters a culture of continual improvement, centred on clear goals and the investments needed to reach them. We are committed to maintaining a safe working environment for all Comac staff.

In 2021, Comac's Management System certification according to 45001 standards confirmed its commitment to protecting employee health. This was achieved through specific processes, investment in enhancements, and ongoing staff training.

The risk assessment document is the cornerstone of the whole system. It offers a straightforward method to spot, measure, and plan how to tackle risks to employee

health and safety, and it guides the improvement of our activities. A crucial foundation for developing the rest of the framework is a set of procedures to manage accidents, injuries, and unexpected incidents. The risk assessment document complies with the requirements of Legislative Decree 81/2008.

We organise periodic, documented training activities on health and safety in the workplace, and such initiatives are repeated for newly appointed personnel and whenever personnel are assigned to new departments. Each employee is urged to exercise the utmost caution when carrying out their duties, being careful to observe all the applicable safety and prevention measures so as to avoid exposing either themselves or their collaborators and colleagues to any potential risk.

We've installed a personal protective equipment vending machine on company grounds, enabling employees to quickly and easily restock or replace damaged gear, ensuring their safety at all times.

To safeguard our staff's health, Comac ensures constant access to clean toilets and drinking water.

### Accident data

#### Employee accidents

	2021	2022
INJURIES RECORDED	5	6
Of which fatal	-	-
Of which with serious consequences	-	-


#### Employee injury frequency indices

	2021	2022
FREQUENCY INDEX Lost Time Accident Rate	3.44	4.08
Mortality index	-	-
With serious consequences	-	-

#### Employee injury severity index

	2021	2022
INJURY SEVERITY INDEX Severity Rate	50.18	36.07
HOURS WORKED BY EMPLOYEES	290,969	293,882

In the area of workers' health and well-being, we have identified the following objective and related actions to achieve it:

SDG Goal	Goal	Actions
 <b>3 GOOD HEALTH AND WELL-BEING</b>	Comac aims to enhance employee well-being by preventing work-related stress, thus ensuring health and safety at work.	Personnel management initiatives

We have established the following key performance indicator (KPI) to measure the attainment of our goal, commencing in the year 2023: number of employee accidents per year.

### 6.3 INTERNAL AND EXTERNAL TRAINING

A company keeping pace with innovative trends and operating in a constantly evolving environment must ensure its staff receive proper training.

A trained workforce can fully understand Comac's business operations, work management, machine production processes, and the steps we take to reach our sustainability goals and continually enhance our company's performance.

In recent years, specifically since 2020, we have honed our expertise in sustainability by using a digital platform to access the Product Carbon Footprint course created by the consultancy and training firm Aequilibria. We subsequently broadened the programme to include our customers, aiming to enhance their understanding of carbon footprints and assist them in grasping why we measure the climate impact of our products.

Every new hire receives a notice as per Legislative Decree 104 of 2022, which clearly states the importance of training at Comac.

The HR department plans and organises training, which includes mandatory sessions on safety, social responsibility (SA8000), and the integrated management system, as well as extra training related to the employee's role in the company. We monitor actual training provided through a schedule on the Zucchetti portal, where every Comac employee can see the number and type of certificates they've earned throughout their career.

In 2022, we provided 1,377 hours of training, marking a 51% increase from the 911 hours delivered in 2021.

Of the training hours delivered, 73% focused on technical subjects, while mandatory training made up 11% and safety training comprised 16%.

TRAINING PROVIDED IN 2022 (BY TYPE)

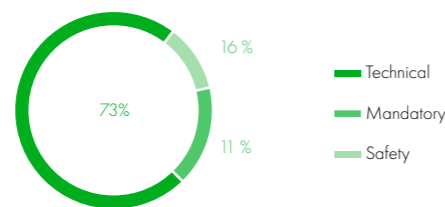


Figure 19: types of training

### 6.4 GENDER EQUALITY

At Comac, we recognise that in Italy, gender inequalities persist in the workplace, including barriers to certain job roles and corporate governance positions, pay disparities between genders, and biases and disadvantages faced by female employees who are, or intend to become, mothers.

Therefore, we are committed to leading by example, working to eliminate any barriers and disparities that may exist between our male and female employees. This begins with increasing the engagement and involvement of women in our community and ensuring that Comac's workplace is wholly inclusive, upholding gender equality.

In comparison to 2021, the number of women within Comac's blue-collar workforce, which has traditionally been predominantly male, has risen substantially by 38%, marking a modest yet positive shift towards gender equality.

CHANGE IN THE NUMBER OF WOMEN EMPLOYED, BY CATEGORY



Figure 20: change in the number of women employed, by category, between 2021 and 2022.

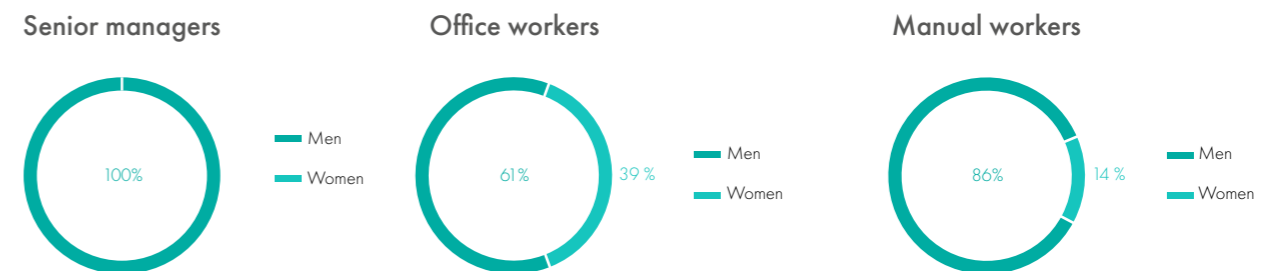


Figure 21: breakdown of job categories by gender.

It is noteworthy that the current Board of Directors of the Comac Group comprises 25% female representation.

BREAKDOWN OF BOARD MEMBERS BY GENDER

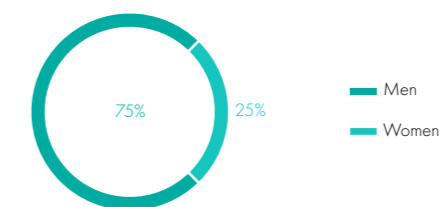


Figure 22: breakdown of board members by gender.



## 6.5 ETHICS AND INTEGRITY

In 2021, Comac instituted its Code of Ethics, underscoring the company's dedication to fostering a culture of honesty, integrity, and dependability. This code delineates the

fundamental principles and guidelines that all Comac employees are obliged to uphold.



Figure 23: performance pyramid.

We request that all individuals within the Comac community familiarise themselves with the contents of the Code of Ethics. This document encompasses a wide range of areas intimately linked to the company's operations, each of which is equally essential.

- Honesty and moral conduct
- Commercial propriety
- Community and environment
- Working relations
- Freedom of association and the right to collective bargaining
- Equal opportunities
- Alcohol and narcotics, smoking
- Protection of health and safety in the workplace
- Compliance with national and international legislation, regulations and standards
- Information and accountability
- Corruption and bribery
- Protection and correct use of company assets
- Company policy on competition
- Turning a blind eye
- Certainty or suspicion of dishonest conduct
- Conflicts of interest
- Abuse of position
- Fraudulent behaviour on the part of managers
- Confidentiality of company information
- Public administration

At Comac, we have established a system of sanctions for breaches of the regulations outlined in the Code. This is in recognition of our commitment to uphold conduct that is ethical, honest, and trustworthy, as well as to reinforce compliance with the prevailing civil and criminal legislation.

Concerns regarding actual or suspected violations of the code can be reported by anyone through the three designated reporting boxes, which are located at various points within the facility to guarantee the utmost confidentiality for whistleblowers. Every report we receive is handled with the utmost confidentiality and without any form of discrimination or retaliation.

We have implemented an Organisational Model 231, in accordance with the provisions of Legislative Decree 231/2001, as a safeguard of the company's integrity against potential criminal acts committed by individuals associated with the company.

We have established a Risk Management system in line with current regulations. This system prioritises our Code of Ethics as one of its fundamental pillars, alongside the creation of a Supervisory Board. The Supervisory Board is responsible for effectively overseeing adherence to the Organisational Model 231, possessing independent powers of initiative and control, consistent with legislative mandates.

In 2022, we faced no penalties for non-compliance with regulations.

## 6.6 NON-DISCRIMINATION AND INCLUSION

Our objective is to foster a wholly inclusive environment, creating a community that makes no distinctions among individuals based on their age, gender identity, sexual orientation, ethnicity, background, disability, religion, political beliefs, or trade union memberships.

All employees, managers, and collaborators must work together to realise this goal within a management framework established according to SA8000 standards, designed to prevent and oversee this critical facet of Comac's operations.

We firmly reject and condemn all forms of discrimination and strive every day to ensure that all Comac personnel are united in a shared journey to prevent instances of unacceptable discrimination, both within and beyond the company's confines.

All employees can report incidents of discrimination anonymously, with their integrity and security fully protected, through the aforementioned reporting boxes.

In 2022, Comac received no discrimination reports from its staff.



# 7 Our commitment to a Sustainable Supply Chain

## CONTENTS

- 7.1 A socially responsible supply chain
- 7.2 An environmentally aware supply chain
- 7.3 Working with suppliers: the value of partnership

500

Suppliers

93%

Italian suppliers

“

Supplier relations are also fundamentally important, and this is why COMAC is committed to pursuing a clear, fair strategy, to planning procurement and making prompt payments.

”

A company's sustainability reaches beyond its own physical and legal confines, inevitably intertwining with the suppliers and partners within its supply chain.

Comac, a company committed to embedding sustainable development deeper into its core, must ensure its suppliers share this vision and actively apply principles of social responsibility and environmental impact reduction.

Our aim is to maintain an ethical supply chain for our production, with a keen focus on environmental performance, and to set a standard for our suppliers by actively pursuing sustainability.

### 7.1 A SOCIALLY RESPONSIBLE SUPPLY CHAIN

Gaining SA8000 certification means that Comac does not just ensure social, ethical, and fair treatment of staff in its own plants and offices, but also commits to upholding these standards with our suppliers.

We insist that our suppliers uphold and safeguard the rights of their employees according to relevant local, European, and international laws. This includes combating child labour, slavery, and all other types of workplace exploitation.

We introduced a thorough risk assessment based on the SA8000 standard criteria by using a "Supplier Social Ethics Questionnaire" for our twenty top suppliers by amount invoiced. The Procurement Department's internal audit, conducted yearly, examines the list of recipients. During this review, we also evaluate suppliers of services or raw materials that don't rank among the top 20 by amount invoiced. If we identify changes, we send the questionnaire to new suppliers.

The questionnaire is structured around twenty questions, through which we ask our suppliers to provide information related to the topic of social responsibility,



such as whether there are children under the age of 18 among the workers, whether discriminatory incidents have occurred, whether working hours and weekly rest periods are respected, or whether risk assessment is carried out.

The answers from the questionnaire are the input for the evaluation, which is structured and described in the procedure "Qualification and Evaluation of Suppliers and External Companies".

At the end of the assessment, we rank suppliers based on how well they meet the SA8000 standards. Should a supplier fail to meet one or more criteria, we propose an improvement plan to address the critical issues.

During the reporting period of this Sustainability Report, we did not identify any suppliers with a significant negative social impact.

## 7.2 AN ENVIRONMENTALLY AWARE SUPPLY CHAIN

Calculating the product carbon footprint has heightened our awareness that to lessen our products' environmental impact, we need a supply chain with minimal environmental effects supporting our production cycle.

We strive to increase understanding of environmental sustainability, aiming to drive change throughout our supply chain, while considering the particular needs of our suppliers. We aim to balance an environmentally and climate-efficient supply chain with the inclusion of small and medium-sized enterprises, which may face significant challenges.

Our Purchasing Department requires suppliers to present proof of Quality, Safety, and/or Environmental System Certifications from accredited bodies. The presence

of these certifications forms a key criterion in assessing our suppliers, as outlined in the "Supplier and External Company Qualification and Evaluation" procedure referenced earlier. In 2022, we added 77 new suppliers, none of whom were chosen solely for their environmental credentials.

During the reporting period of this Sustainability Report, we did not identify any suppliers with a significant negative environmental impact.

## 7.3 WORKING WITH SUPPLIERS: THE VALUE OF PARTNERSHIP

We believe that Comac S.p.A.'s position as an industry leader comes partly from its skill in creating strong partnerships with suppliers, building a network of trust and dependability.

Our Integrated Policy reaffirms this concept, emphasising that "Supplier relations are also fundamentally important, and this is why COMAC is committed to pursuing a clear, fair strategy, to planning procurement and making prompt payments."

We see it as a benefit that most of our 500 suppliers are based in Italy and adhere to the strictest social and environmental quality standards, which come from following national and European laws. Having suppliers nearby enables us to minimise the environmental impact

of our supply chain, which comes from transporting raw materials to our factory, and to lessen the risk linked to global trade restrictions.

We aim to further solidify our partnership strategy with our suppliers, improving the quality of the products they provide us, which we use to make our machines.



## 8 Our commitment to the Community & Local Area

### CONTENTS

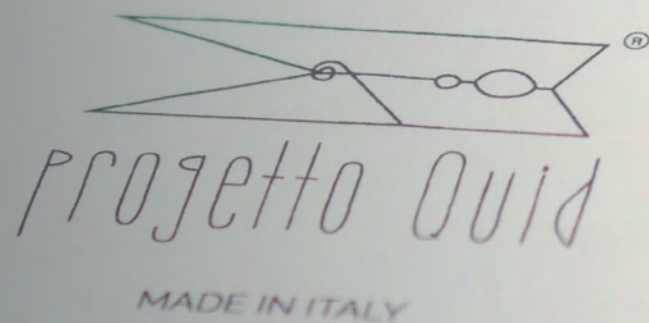
- 8.1 Giving back to the community and local area
- 8.2 Economic impact of investments on the community and local area

15

Young talent hosted as part of the PCTO scheme

1

New and important ethical and sustainable partnership



“

*Comac and its team must engage transparently and honestly with all groups that have a stake or interest in, or are affected by, the social and economic impacts of Comac's work. This includes local councils, schools at all levels, and union representatives both outside and inside the company.*

”

#### 8.1 GIVING BACK TO THE COMMUNITY AND LOCAL AREA

In addition to offering high-quality products, we take pride in driving economic growth in our local community: we create jobs, provide career opportunities and collaborate closely with our suppliers, boosting the local economy and aiding economic growth.

We invest actively in the communities where we work because we think it's crucial to give back and support projects and initiatives that enhance people's quality of life. We strive to create positive change by supporting education, culture, and other vital social initiatives through donations, projects, and partnerships.

Investing in young people is crucial for Comac's future and the future of society as a whole. Young people drive innovation, creativity, and change. That's why we at Comac see it as vital to invest resources, time, and support in nurturing and growing young talent. Investing in young people helps us grasp new opportunities and stay ahead in a constantly changing world. It also fosters a company culture centred on ongoing learning and skill development. We favour apprenticeships as the gateway for young people starting their careers, providing chances for career

advancement. This approach helps us draw in and keep hold of promising talent, building a skilled and driven team.

We also invest in young people to promote social inclusion and lessen inequalities. We understand that providing jobs and growth chances to young people from various social and economic backgrounds helps build a fairer and more sustainable future for coming generations.

Between 2021 and 2022, through partnerships with high schools for the PCTO programme, we welcomed 15 students to work in both our offices and manufacturing units. Their placement within the company, perfectly aligned with their field of study, enabled us to share our knowledge, experience, and company values with each individual. We planned and organised the young people's activities to help them integrate into Comac and the broader working world effectively.

#### WHY IS IT IMPORTANT TO PARTICIPATE IN PCTO?

The Pathways for Transversal Skills and Orientation (PCTO) scheme, set up through the law that reformed the school/work experience programme, provide a vital opportunity for young people to blend classroom learning with hands-on experience at Comac.

By encouraging students to engage with their studies and helping them find their passions, interests, and learning styles, PCTO schemes play a vital role in enhancing young people's education, allowing students to gain practical and technical skills firsthand.



## 8.2 ECONOMIC IMPACT OF INVESTMENTS ON THE COMMUNITY AND LOCAL AREA

The concept of sustainability rests on three core pillars: *Environment, Social & Governance* (ESG) factors. From an ESG standpoint, sustainability should encompass a company's economic considerations, focusing on prudent financial management and the broader economic influence on the local area. This means adopting an economic strategy that considers both the company's immediate needs and the long-term impact of its actions on all stakeholders.

At Comac, we strive to do more than just make short-term profits. Our goal is to build lasting value and to make a positive impact on the local area and the communities we serve.

We know our success ties tightly to the local area's well-being and wealth. So, we invest and partner up, launch various initiatives to drive a positive, lasting economic effect that reaches far beyond our company's boundaries.

We aim to actively support sustainable development and enhance people's well-being, and our partnerships with local bodies feature Progetto Quid.

## COMAC AND PROGETTO QUID: AN ETHICAL AND ENVIRONMENTALLY FRIENDLY PARTNERSHIP

*Quid and Comac are two organisations from different sectors yet united by a shared vision and a pioneering business model that blends ethical practices, sustainability, people-focused approaches, circular economy principles, and Italian manufacturing.*

Progetto Quid is an ethical and sustainable fashion brand established in 2013 with the aim of creating job opportunities for vulnerable individuals, particularly women, helping them to overcome personal and social challenges. Progetto Quid creates clothing and accessories using recycled surplus fabrics. The project offers a fresh start to both individuals and the materials used to create clothing.

Our introduction to Quid arose from the necessity to acquire new corporate uniforms for Comac. This company champions inclusion, diversity, and waste reduction. At Quid, we found more than just a supplier for our corporate uniforms; we found a partner that embodies our values. Together, we've fostered new chances for social integration that benefit both individuals and our local area.

Progetto Quid has therefore become Comac's ethical and social partner, developing and producing various products and accessories that have become part of the company's daily operations. This valuable partnership strives to minimise material waste, thereby protecting the environment while simultaneously supporting a social and ethical initiative.



## 9 Our commitment to creating Value

### CONTENTS

- 9.1 Openness: communication, certifications and transparency
- 9.2 Governance
- 9.3 Working with customers: the value of partnership
- 9.4 Economic performance



8  
Certifications

3  
Trade associations

“

*Comac recognises that efficient management of the relationships between the various stakeholders contributes significantly towards generating value.*

”

Since its inception, Comac has generated value through a family-led governance approach, ensuring stability and long-term vision. This approach has fostered strong partnerships with customers, dependable products, and innovation.

We invest in technology that stays ahead of market trends. Comac is dedicated to creating more self-sufficient cleaning machines that work effectively with little oversight.

Robotics in scrubbing machines is revolutionising the cleaning industry. It not only reduces the number of people working in unhealthy conditions but also significantly improves health and job quality in the sector.

Comac has developed its first robotic machine prototypes with the launch of SELF.Y, which work with minimal supervision. The company plans to keep advancing in this direction, aiming to create products that enhance work quality in the industry and reduce the need for repetitive tasks.

## 9.1 OPENNESS: COMMUNICATION, CERTIFICATIONS AND TRANSPARENCY

There is a growing necessity for businesses to initiate dialogue with civil society and consumers, extending beyond their corporate boundaries through trustworthy communication regarding their product and company performance to their stakeholders. This includes obtaining recognised certifications that officially confirm their dedication to quality, sustainability, and transparency. The latter also implies the honest communication of any negative incidents.

In the Code of Ethics, we affirmed that activities involving the exchange of information and dialogue with stakeholders must be carried out in a timely manner, ensuring clarity, transparency, completeness and consistency, with respect to the right to information.

We follow these principles when labelling our products too. We aim to provide essential information about the product's origin, components, safe use of our scrubbing machines, and proper disposal instructions. We've also created a Recyclability Guide to help with this. We take

pride in reporting that in 2022, we had no instances of labelling non-compliance with either the law or our own principles.

We see certifications as a crucial means to clearly communicate our successes and pledges, as well as to generate value, both inside and outside the company.

Comac has actively pursued these certifications in environmental and social areas:

Comac: people, processes  
and environment.  
Key to success

## COMAC'S CERTIFICATIONS



### WTL (DEFRA)

The Water Technology List, managed by the British government department DEFRA (Department for Environment, Food and Rural Affairs), promotes and certifies products that enable reductions in water consumption.

The list of WTL certified products is available online (<http://wtl.defra.gov.uk>) and can be used to choose products that respect the environment and promote a responsible use of the resources required: this choice is one that is encouraged by the British government due to the benefits deriving from the significant tax reduction on purchases of these products.



### CE

Our machines are made following EU Directives 2006/42/EC, 2014/35/EU, 2014/30/EU, and the relevant IEC standards 60335-1 and 60335-2-72, which vary based on the model listed in our catalogue.



### ISO 9001:2015

An organisational model based on a process guide using quality management principles - essential for good company management.



### ISO 14001:2015

An official recognition guaranteeing that the environmental impact of the business is being kept under control, with an ongoing commitment to reduce that impact.



### ISO 45001

ISO 45001 sets the first global standard for upholding minimum good practice in safeguarding workers everywhere. It sets out a plan to enhance safety, minimise workplace risks, and improve workers' health and well-being.



### EUnited PM10

The EUnited PM10 Test is the only test endorsed by nearly every European sweeping machine manufacturer. We defined the test procedure in partnership with a Canadian research centre, and it's now on track to become a European standard. A qualified and independent organisation conducts the tests for European Municipal Equipment. The findings are consistent and reproducible, always encompassing the machines' sweeping efficiency. They are indicated by a system of stars: 1 star indicates that the minimum requirements have been met; while 3-star sweeping machines release a lower concentration of PM into the air after sweeping.



### ISO 14067

ISO 14067 sets out methods to measure and report the carbon footprint of products, aligning with global standards for life cycle assessment.



### SA8000

Certification regarding Social Responsibility focuses on employee welfare and encourages ethical and fair practices within the supply chain.

We believe these tools will enable us to market Comac's machines effectively, highlighting their environmental and social benefits as well as the company's performance. Our marketing activities stand as evidence of our commitment to compliance; not one has faced any breach of regulations.

Comac will keep investing effort and resources to reach new targets and gain certifications that add value and demonstrate our dedication to environmental and social sustainability.

Openness also involves networking and engaging with other entities in the industry. Bearing these principles in mind, Comac belongs to three different trade associations:



#### AFIDAMP

AFIDAMP unites and speaks for all operators in Italy's professional cleaning supply chain. Originally set up to defend the interests of manufacturers and distributors in the cleaning industry, the Association has evolved into a growing network fostering engagement and dialogue. AFIDAMP acts as a trusted authority for participants in the cleaning market, including public bodies and institutions. AFIDAMP serves as a key contact in the ongoing creation of laws and rules related to professional cleaning.



#### ECOPED

National Consortium for the Management of Waste Electrical and Electronic Equipment (WEEE), Batteries, and Accumulators (WBA). ECOPED champions the protection of the environment and humanity, showing complete respect for the ecosystem and the desires of its members. It promotes innovative programmes and specialised services across the entire waste management cycle, aiming to embody the paradigm of efficient resource (re-)utilisation by reintroducing secondary raw materials back into new production cycles, in line with the codes of conduct on social and environmental responsibility.



#### EUnited

EUnited offers businesses a way to engage with European bodies and partner groups, voicing the contributions of equipment suppliers in shaping technical standards, crafting policies, addressing trade matters, and influencing legislation. Within a single European association, member companies are grouped into three sectors: Cleaning, Municipal Equipment, and Vehicle Cleaning.

We are confident that our commitment will be rewarded by consumers in Italy and abroad who are increasingly conscious and eager to purchase products with certified added value.

## 9.2 GOVERNANCE

At Comac, our business model thrives under the Ruffo family's leadership, which steers our operations and sets our goals.

We believe our model is practical, offering stability to our operations and enabling us to plan for the future with confidence in the continuity of governance.

As part of the Comac Group, the highest governance body is the Group Board of Directors, appointed by the Shareholders' Meeting. The Board of Directors is elected every three years, adhering to regulatory standards.

As of now, there is no set procedure outlining how and on what grounds the Shareholders' Meeting appoints Board of Directors members. This stems from the fact that the Comac Group's shares are entirely family-owned.

We ensure the Board of Directors' integrity by implementing Model 231 and creating clear procedures within our Quality Management System (ISO 9001). These measures aim to eliminate any chance of a conflict of interest at the highest governance body.

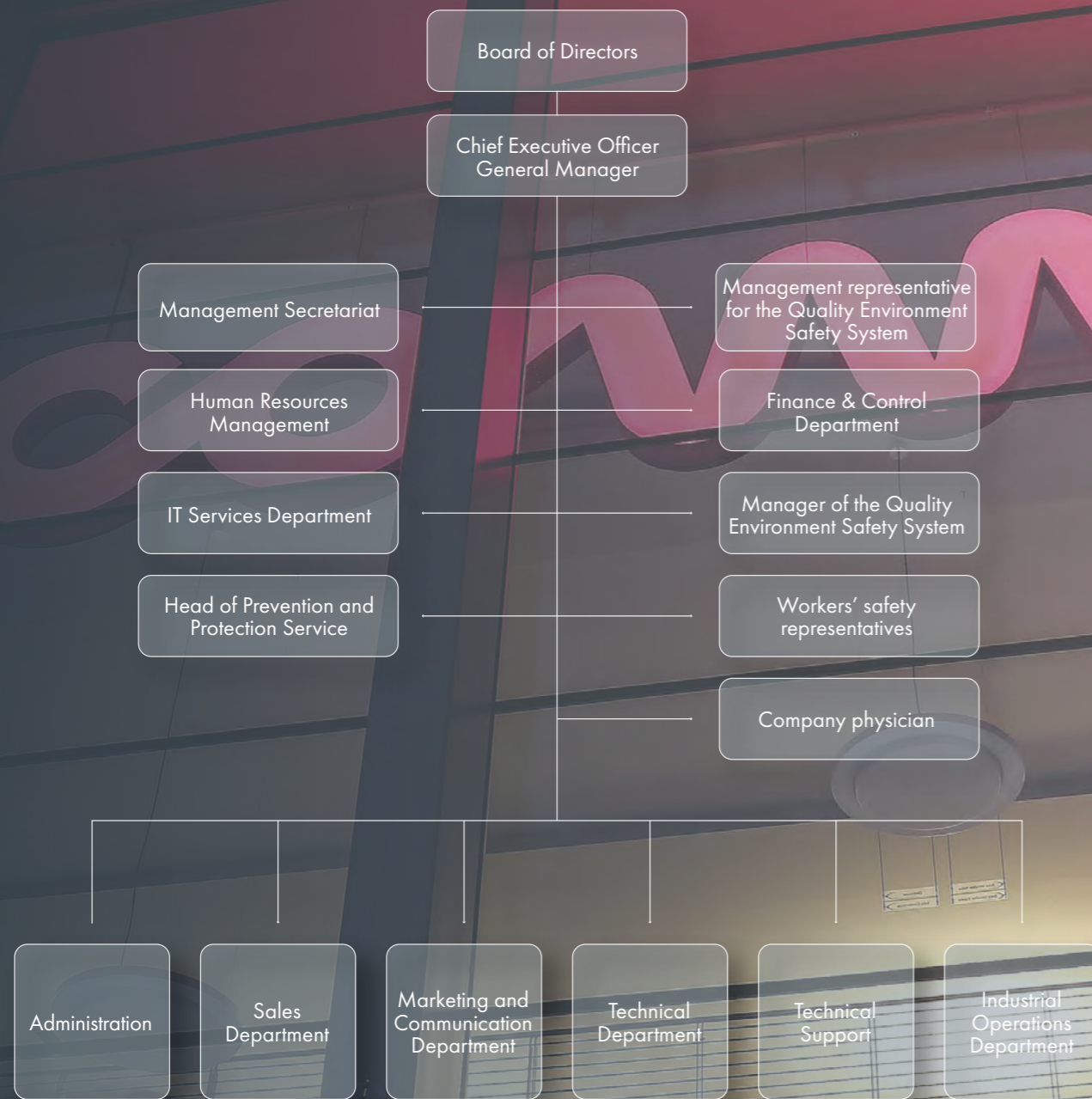
The Board of Directors sets Comac's strategies, policies and goals, covering environmental, social and economic matters, and approves projects in these domains. Board members enhance their understanding of sustainability through online training, aiding their decision-making capabilities.

Our Integrated Policy on Quality, Occupational Health and Safety, and Environmental Protection, as previously stated, clearly outlines the commitments of our highest governance body regarding sustainable development.

The Board engaged actively with sustainability matters, highlighted by Comac's Chairman creating educational videos on the ISO 14067 standard, which covers product carbon footprints. This initiative aimed to inform and increase awareness among our internal and external stakeholders about environmental impacts.

Day-to-day management, strategy implementation, goal achievement, and oversight of processes concerning environmental, social, and economic matters at Comac fall to designated managers within the company. They directly engage with the Board members and the President of Comac to update on project progress and secure final approval.

The Board of Directors has granted the Purchasing Director limited authority to spend on raw materials, which includes choosing suppliers.



Comac's other governance bodies include the Board of Statutory Auditors and the Independent Auditors, which carry out legal and accounting checks as required by law.

The current Board of Statutory Auditors took office on 29 June 2021, following appointment by the Shareholders' Meeting, and will serve until 31 December 2023. The Board, made up of six members, is responsible for overseeing:

- compliance with the law and the bylaws
- compliance with the principles of good administration
- the adequacy and functioning of the organisational system
- the adequacy and functioning of the internal control system
- the adequacy and functioning of the administrative and accounting system
- the separate financial statements and the directors' report
- the consolidated financial statements and the directors' report

### 9.3 WORKING WITH CUSTOMERS: THE VALUE OF PARTNERSHIP

Comac's values have always included a commitment to customers, based on two priorities: complete satisfaction of their expectations and the user-friendliness of our products. Our company has always been guided by the search for the finest technologies, ensuring we always focus on the ultimate aim of satisfying our machine users' needs.

This principle is also highlighted in Comac's Integrated Policy, where the company pledges to provide outstanding customer service, "guaranteed by a full commitment to recognising and fulfilling customer needs

and requirements, both before and after sale, which is fundamental to ensuring complete customer satisfaction".

We believe it's crucial to continually reinforce the robust partnership we've established with Comac's customers, including developing tailored solutions to address their unique requirements.

### 9.4 ECONOMIC PERFORMANCE

2022 was a year of strong recovery of the global economy, in the context of a gradual exit from the Covid-19 pandemic, but it was also a year marked by the beginning of the conflict in Ukraine and rising energy costs. Despite the challenges, we achieved growth in the economic value we created, increasing from nearly €48 million to over €55 million. This value

comes from the income generated during the reporting period through the sale of services and products, along with other income (financial income, other income, etc.), net of depreciation/amortisation and impairment, and value distributed in different ways to our stakeholders.

€'000	2021	2022
Revenues	45,575	52,960
Change in inventories PF	-338	339
Other income	506	552
Net financial income/expense	-178	-240
Income from equity investments	/	/
Exchange rate gains/losses	-2	-7
Net impairment of tangible and intangible assets	/	/
<b>(A) TOTAL ECONOMIC VALUE GENERATED</b>	<b>45,563</b>	<b>53,604</b>
Supplier remuneration and operating costs	31,483	39,533
Staff remuneration	9,186	9,577
Remuneration of financial institutions	3,614	4,880
Change in inventories RM	-247	-1,211
Payments to Public Administration	1,428	1,763
Donations and gifts	/	/
<b>(B) TOTAL ECONOMIC VALUE DISTRIBUTED</b>	<b>45,464</b>	<b>54,542</b>
<b>(A-B) ECONOMIC VALUE RETAINED</b>	<b>99</b>	<b>-938</b>

Regarding GRI 204-1 "Government Financial Assistance," Comac did not receive any significant subsidies or tax breaks in the reporting year.

## 10 GRI Content Index

<b>RELEVANT SECTOR STANDARDS</b>	To date, there are no relevant sector standards for Comac S.p.A.
<b>DECLARATION OF USE</b>	Comac S.p.A. has presented reporting in accordance with GRI Standards for the period from 1 January to 31 December 2022.
<b>GRI 1 USED</b>	GRI 1 – Foundation – 2021 version

GRI standard	Disclosure	Omission		Comments and explanations	Source & page
		Requirements omitted	Reason		
<b>General disclosures</b>					
<b>GRI 2 - General Disclosures - version 2021</b>	2-1 Organisational details				7-10
	2-2 Entities included in the organisation's sustainability reporting				6
	2-3 Reporting period, frequency and contact point				6
	2-4 Restatements of information				First report
	2-5 External assurance				The Sustainability Report has not been subjected to external assurance
	2-6 Activities, value chain and other business relationships				7-10
	2-7 Employees				43-50
	2-8 Workers who are not employees	letters a, b, c.	Not applicable	There are no non-employees	/
	2-9 Governance structure and composition				70-71
	2-10 Nomination and selection of the highest governance body				70
	2-11 Chair of the highest governance body				70
	2-12 Role of the highest governance body in overseeing the management of impacts	letters b-i, b-ii, c.	Not applicable	Family business model	/
	2-13 Delegation of responsibility for managing impacts				70
	2-14 Role of the highest governance body in sustainability reporting				21; 70
	2-15 Conflicts of interest				70
	2-16 Communication of critical concerns				70
	2-17 Collective knowledge of the highest governance body				70
	2-18 Evaluation of the performance of the highest governance body	letters a, b, c	Not applicable	Family business model	/

2-19 Remuneration policies				49
2-20 Process to determine remuneration	letters a, b, c	Not applicable	Family business model	/
2-21 Annual total compensation ratio	letter b	Information not available	The data will be analysed from 2023 onwards	49
2-22 Statement on sustainable development strategy				3-4
2-23 Policy commitments				70
2-24 Embedding policy commitments				70
2-25 Processes to remediate negative impacts				55
2-26 Mechanisms for seeking advice and raising concerns				55
2-27 Compliance with laws and regulations				55
2-28 Membership associations				69
2-29 Approach to stakeholder engagement				18
2-30 Collective bargaining agreements				49

### Material topics

<b>GRI 3 - Material topics - version 2021</b>	3-1 Process to determine material topics			18-22
	3-2 List of material topics			20-22

### Resources

<b>GRI 3 - Material topics (2021)</b>	3-3 Management of material topics			40
<b>GRI 301: Materials 2016</b>	301-1 Materials used by weight or volume			40
	301-2 Recycled input materials used			40
	301-3 Reclaimed products and their packaging materials			40

### Energy

<b>GRI 3 - Material topics (2021)</b>	3-3 Management of material topics			30-34
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the Organisation			32

### Water

<b>GRI 3 - Material topics (2021)</b>	3-3 Management of material topics			27-29
<b>GRI 303 - Water and effluents (2016)</b>	303-1 Interactions with water as a shared resource			27-29
	303-2 Management of water discharge-related impacts			29
	303-3 Water withdrawal			29

Emissions				
GRI 3 - Material topics (2021)	3-3 Management of material topics			35-36
GRI 305: Emissions 2016	305-1 Direct (Scope 1) greenhouse gas (GHG) emissions			35
	305-2 Energy indirect (Scope 2) greenhouse gas (GHG) emissions			35
Waste				
GRI 3 - Material topics (2021)	3-3 Management of material topics			37-39
GRI 306 - Waste (2020)	306-1 Waste generation and significant waste-related impacts			38
	306-2 Management of significant waste-related impacts			38
	306-3 Waste generated			38-39
	306-4 Waste diverted from disposal			38
	306-5 Waste directed to disposal			38
Supplier environmental assessment				
GRI 3 - Material topics (2021)	3-3 Management of material topics			58-60
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria			59
	308-2 Negative environmental impacts in the supply chain and actions taken			59
Employment				
GRI 3 - Material topics (2021)	3-3 Management of material topics			41-50
GRI 401: Employment 2016	401-1 New employees hires and turnover		The definition "most significant operational sites" is not relevant	45-46
Occupational health and safety				
GRI 3 - Material topics (2021)	3-3 Management of material topics			51-52
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system			51
	403-2 Hazard identification, risk assessment, and incident investigation			51
	403-3 Occupational health services			51
	403-5 Worker training on occupational health and safety			53
	403-9 Work-related injuries			52

Training				
GRI 3 - Material topics (2021)	3-3 Management of material topics			53
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee			53
Equal opportunities				
GRI 3 - Material topics (2021)	3-3 Management of material topics			54
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees			54
Non-discrimination				
GRI 3 - Material topics (2021)	3-3 Management of material topics			56
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken			56
Freedom of association and collective bargaining				
GRI 3 - Material topics (2021)	3-3 Management of material topics			43
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk			49
Local communities				
GRI 3 - Material topics (2021)	3-3 Management of material topics			62-64
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs			62-64
	413-2 Operations with significant actual and potential negative impacts on local communities			62-64
Economic performance				
GRI 3 - Material topics (2021)	3-3 Management of material topics			58-60
GRI 201: Economic Performance (2016)	201-1 Direct economic value generated and distributed			72
Indirect economic impacts				
GRI 3 - Material topics (2021)	3-3 Management of material topics			72
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported			63
	203-2 Significant indirect economic impacts			66

Marketing and labeling					
GRI 3 - Material topics (2021)	3-3 Management of material topics				67; 69
	417-1 Requirements for product and service information and labeling				67
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling				67
	417-3 Incidents of non-compliance concerning marketing communications				67

### NON-GRI MATERIAL TOPIC

Disclosure	Comments and explanations	Source & page
Ethics and integrity		
3-3 Management of material topics		55
Customer relations		
3-3 Management of material topics		72
Supplier relations		
3-3 Management of material topics		60
Governance		
3-3 Management of material topics		70



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Comac S.p.A. org. cert. ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, SA 8000:2014

