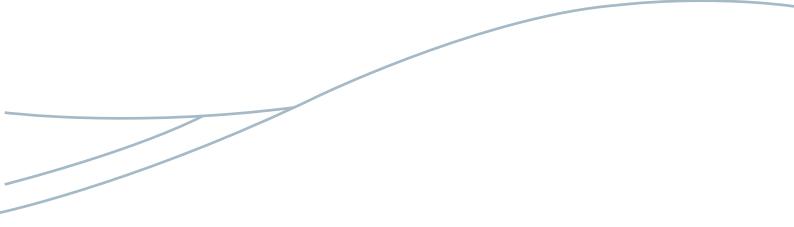


Sustainability Report Year 2023





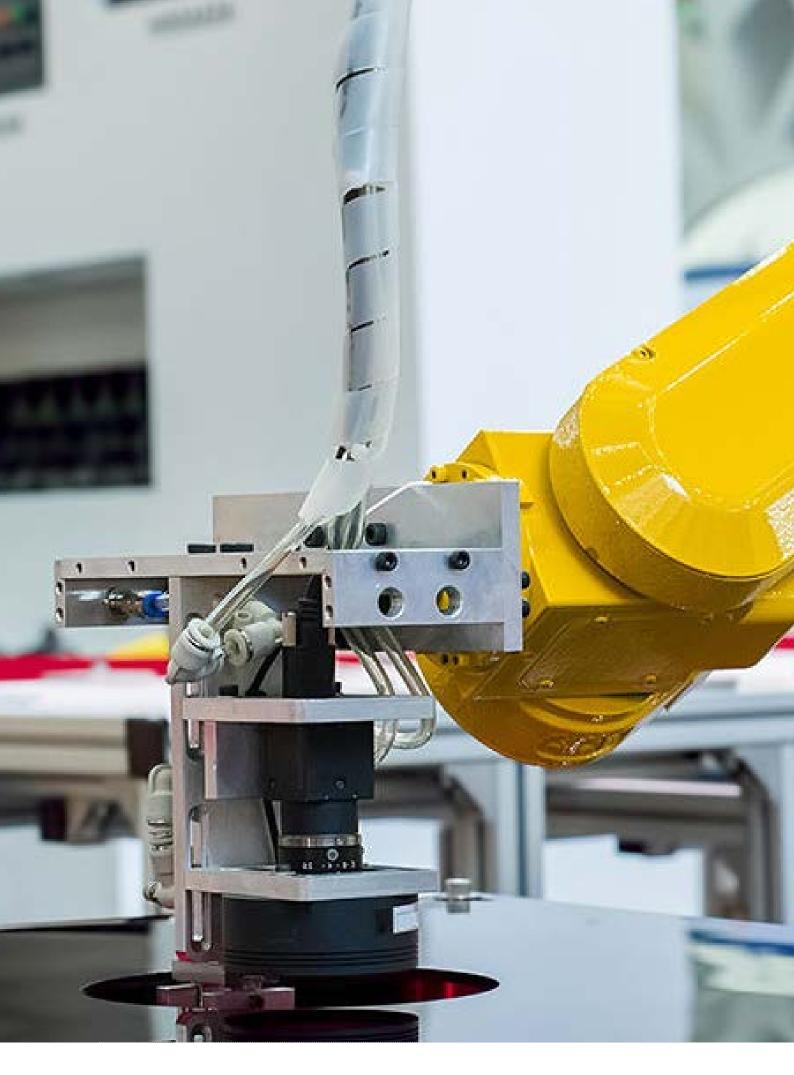


TECHNOLOGY - ITALY

Sustainability Report

Year 2023





STELIAU TECHNOLOGY - ITALY

Organisation profile

GRI 2-1 • GRI 2-2 • GRI 2-6 • GRI 2-12 • GRI 3-3

The company markets electronic and electromechanical components, professional electronic systems, products and special materials for the manufacturing industries. The target sectors are public, private and space industry, nationally and internationally.

The company's sales are mainly aimed at direct sales. The company targets both the domestic and foreign markets. It conducts its business at its head office in viale Sarca 336 - building 13, 20126 Milan.

The company changed its name to STELIAU TECHNOLOGY - ITALY as of 1 January 2024. In fact, Special-Ind was acquired in 2021 by Steliau Technology, a leading French company in the value-added supply of electronic solutions.

This report deals with **Steliau Technology Italy**'s arrangements at its previous location, Piazza Spotorno 3, Milan.





Sustainability Report 2023

Made by





Summary

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66

Passion for innovation means designing today what will be the future, what will make the most efficient production, turning what seems impossible into reality. It is this passion that unites us with our supply chain partners, with the ultimate goal of contributing to the well-being of the community.

Massimo Loche CEO Steliau Technology Italy



GRI 2-3 • GRI 2-4 • GRI 2-5

The company publishes its results regarding **environmental and social sustainability in a special report**, starting in 2022 and on an annual basis. During the reporting period, it was not necessary to reformulate the information contained in the previous year's report.

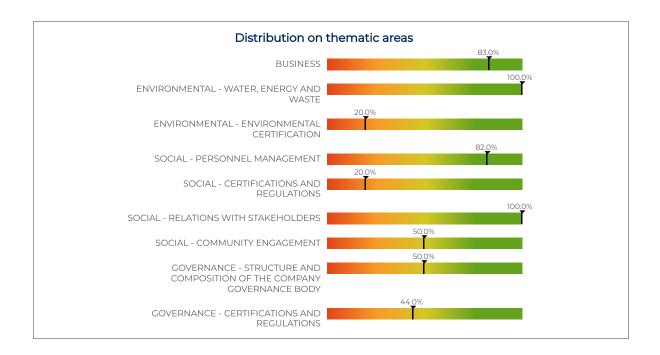
The Non-Financial Statement was prepared in accordance with the **GRI Sustainability Reporting Standards**, defined in 2016 by the Global Reporting Initiative (GRI Standards) and updated to 2021, in association with the **Sustainability Accounting Standards Board (SASB)** for the definition of material issues. This reporting was audited by the designated auditor CRIF/CRIBIS in accordance with the principles and guidance contained in **ISAE3000** (International Standard on Assurance Engagement 3000 - Revised) of the **International Auditing and Assurance Standards Board (IAASB)**.



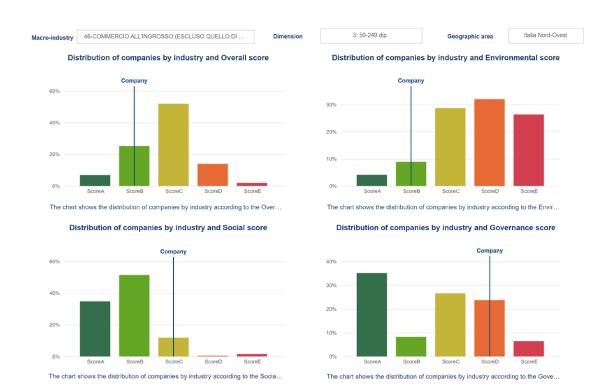
This declaration is published on the Company's website at **www.steliau.it**. You can request information at: **esg@steliau.it**.



Even a quick comparison of the Scores makes it easy to see how the company managed to achieve modest improvements during the year, especially in the area of environmental and sector management. The investments and steps forward made by **Steliau Technology Italy** are therefore aimed at 360° every year towards the development of corporate sustainability.



Benchmark Statistics



Why was it important for Steliau Technology Italy to complete the Synesgy questionnaire?

- It has enabled the company to create a virtuous circle with its customers, suppliers and all stakeholders
- It is a questionnaire that can be used in all recognised banking circuits, as it is based on international measurement criteria (GRI)
- It relies on a platform that allows data collection in a few moments
- V It is implemented by CRIF, an internationally recognised player



Data are shared in real time

Stakeholder Engagement

GRI 2-29

The Goal of Stakeholder Engagement

The objective of strengthening a **sustainable business model** involves not only monitoring and improving environmental and social impacts, but also the need for dialogue **and discussion with stakeholders**. The ability to understand and assess the needs and expectations of stakeholders is particularly important with a view to **sharing a common value** aimed at improving the impact, **quality and efficiency of corporate services** and, at the same time, the **well-being of the stakeholders** who directly or indirectly relate to the company.

By listening to/confronting different stakeholders and local actors, it is possible to create the conditions for guiding the **sustainability strategies of the company** itself, defining objectives in the common interest.

Stakeholder	Functions involved	Expectations	Activities	Engagement tools	Answer
Company: Investors and partners	Directorates, general affairs, commercial area, communication and PR	Sharing quality standards, planning services and activities, comparing impacts and results	Several meetings during the year	Assemblies, presentations, communication exchanges, surveys on environmental sustainability issues	Presentation of projects, plans, reports and budgets
Employees and trade union representatives	Human Resources	Sharing values, objectives	Meetings and activities, meetings with trade union representatives scheduled	Assemblies, training sessions, dedicated meetings, refreshment areas, dedicated surveys, observatory	Trade union agreements
Customers	Commercial area	Greater knowledge of expectations	Meetings and activities scheduled throughout the year	Customer satisfaction surveys, newsletters, meetings and surveys on the subject of environmental sustainability	Presentation of investigation results
Suppliers of goods and services	Purchases	Large demand guarantee	Several meetings and contacts during the year	Selection procedures, exchange of documentation, meetings	Contracts
Institutions	Directions	Compliance with rules and regulations, respect for contracts and regulatory updates	Periodic meetings	Meetings and exchange of communications also in relation to regulations in contracts	Reports, surveys, budgets
Banks and lenders	Direction	Economic, financial and asset soundness and sustainability	Not periodic, but aimed at specific projects	Meetings and exchange of communications	Analysis reports, trade agreements
Local communities and communities	Communication and PR	Creating shared value	Various analysis and comparison activities	Communication and marketing campaigns	Events, open spaces, initiatives open to the public

SDGs: UN Sustainable Development Goals





On 25 September 2015, the governments of 193 UN member states signed the Agenda 2030 for Sustainable Development.

A programme of action approved by the UN General Assembly, which includes 17 specific Sustainable Development Goals (SDGs), framed within a broader programme of action with a total of 169 targets or goals.

The 17 Goals commit governments and nations but also every single company. ESG principles are the declination of what companies must do.



Steliau Technology Italy and the SDGs

The Synesgy questionnaire allowed Steliau Technology Italy to map the materialities and issues in the area of sustainability, thus highlighting the most relevant facts realised during the reporting year in question and providing its stakeholders with an immediate, but above all certified picture - since it responds to internationally recognised parameters - of its activity.

The path of awareness started led to the highlighting of a virtuous path by Steliau Technology Italy and witnessed by the concordance of its actions with 5 of the 17 SDGs (Sustainable Development Goals) recognised by the United Nations.



3 - HEALTH AND WELL-BEING Ensuring health and well-being for all.



7 - CLEAN AND AFFORDABLE ENERGY Integrate low-impact solutions into your production cycle by using sustainable energy sources.



8 - DECENT WORK AND ECONOMIC GROWTH Promote full and productive employment, decent working conditions and sustained economic growth.



9 – BUSINESS, INNOVATION AND INFRASTRUCTURE Resilient infrastructure, sustainable industrialisation and innovation.



12 – RESPONSIBLE CONSUMPTION AND PRODUCTION Ensuring sustainable patterns of production and consumption.

The tracking of issues thanks to Synesgy and the 26 materialities, which can be traced back to the ESG areas, on the basis of this emergence, started a real path of awareness involving, through several communication channels, all stakeholders.





Environment



Management of environmental impacts

GRI 2-25 • GRI 3-3 • GRI 307

Organisations may be affected by impacts either through their own activities or because of their business relationships with other entities. It is therefore crucial for the company to identify the impacts it causes, but also those that it contributes to causing and that are directly related to its activities, products or services through a business relationship. In this context, the virtuous company is the one that highlights these impacts and identifies strategies to avoid, mitigate, remedy the negative impacts or further improve the positive ones.

Steliau Technology Italy has nationally or internationally recognised third-party environmental certifications.

The company is able to collect environmental data related to its activities.

Measures to reduce the environmental footprint of the company and its activities are implemented through:

- I A primary air ventilation system with a dedicated AHU Air Handling Unit,
- A centralised heating/cooling system with heat pump and recuperator, An air-conditioning,
- System with a 4-pipe hydronic system via ceiling fan-coil.

Materials

GRI 301-1 • GRI 301-2 • GRI 301-3

The company's focus on the materials used and their impact on the environment is of paramount importance, not only with regard to the production phase of the products, but also throughout the product's life cycle.

Steliau Technology Italy uses recycled materials in its activities. The percentage of expenditure on recycled materials in relation to total purchases is 20%. The company's managed products require additional packaging before delivery.

The type of material most commonly used for packaging is:

- Ø plastic and derivatives,
- Ø paper and cardboard,
- 🔗 wood.

As part of the activities carried out, practices and procedures are adopted to ensure the recycling/ recovery of waste through:

- The reuse of own or third-party waste material,
- The sale/transfer of waste to third parties for reuse,
- **O** The use of environmentally friendly materials.

For the implementation of waste recycling/recovery practices and procedures, the company has initiated collaboration processes with other parties (also outside the sector); for instance, Steliau Technology Italy collaborates in waste management and disposal with the certified company 'II Recupero'.



Energy

GRI 3-3 • GRI 302-1 • GRI 302-4 • GRI 302-5

Energy consumption for the company, associated with rationalisation, is a fundamental parameter to describe the impact it has not only in terms of efficiency, but also in terms of environmental benefits. The monitoring system in terms of energy used/distributed/saved allows the company to identify the areas in which it is most necessary to intervene for a better rationalisation of resources, with a view to an ever-improving strategy for its efficiency.

Steliau Technology Italy has an electricity consumption of 1,800 MWh.

The company has electricity supply contracts with renewable energy sources only.

The company has carried out energy efficiency measures with a total value of EUR 250,000 over the past five years, in particular in 2022.

This was made possible by the signing of a lease agreement to relocate the offices and head office to a Net Carbon Zero (Eco2Air® Filter) building, enabling a 100% reduction in emissions. The building is free of filter offsets and has a CO2 impact of 7210 tonnes.

The company estimated a 30% reduction in consumption compared to the year before the efficiency measures.

The company invests in activities with a focus on sustainable innovation of logistics processes, in particular in the introduction of innovative systems for the energy efficiency of goods handling processes. The analysis and data collection systems used by the company are able to return information on energy consumption.

Steliau Technology Italy adopts measures to optimise and/or reduce the environmental footprint of its activities and/or the materials/instruments used, e.g. from an energy point of view (e.g. LED lighting of plants).

In addition, the new premises in Viale Sarca 336, Milan:

- Il rented premises have access to natural light;
- In the common areas there is a lighting control system that allows the lighting levels to be adjusted. The site is equipped with energy-saving luminaires and the lighting system in the common areas is PIR-controlled.
- the basic building is equipped with solar shading.



250.000 Euro Investment in energy efficiency

The company has energy supply agreements that provide for an energy mix with less environmental impact (e.g. energy from renewable sources).

The offices have obtained third-party certification related to their energy class; in particular, energy class A or higher was obtained.

Water and waste water

GRI 303-2 • GRI 303-5

The **sustainable management of water resources** is of paramount importance for the organisation's impact on the environment, considered as a shared asset to be preserved.

Working with stakeholders in this context is essential for the organisation to **manage water** resources **sustainably as a shared good** and to take into account the needs of other river basin users. Together with stakeholders, the organisation can define **collective goals for water use**, increased investment in infrastructure, policy promotion, capacity building and awareness-raising. It is therefore important, in this context, to involve its stakeholders, starting with those internal and closest to the company - employees, non-employee workers, consultants, suppliers, first and foremost - in order to **share best practices in terms of rationalising water resources** and making better use and exploitation of them.

The water consumed in one year by all company locations is 150 m³.

The analysis and data collection systems used by the company are able to return information on the amount of water consumed and/or reused.

In particular, at the new premises in Viale Sarca 336, Milan, there are 24 sub-meter 'flow meters' to monitor water consumption.

The main meter also supplies water for irrigation, since there is an automatic irrigation system on site.





Emissions

GRI 3-3 • GRI 305-1 • GRI 305-2 • GRI 305-3 • GRI 305-5

Direct or indirect GHG emissions, emissions of other ozone-depleting gases and their monitoring, as well as actions aimed at their reduction, confirm the organisation's attitude towards **reducing its production impact on the ecosystem.**

Also influencing the level of direct emissions are the **energy sources owned or controlled by the organisation**, such as electricity generation, heating, cooling and steam, as a result of the combustion of energy sources. Hence the importance of the **company's monitoring of emissions**, but also, and above all, its contribution to the increasing efficiency of energy resources influencing the levels of air emissions.

Steliau Technology Italy measures company emissions related to air pollution: Total SCOPE 1 greenhouse gas emissions (direct emissions) are 1,894.88 tCO2 eq.

The total SCOPE 2 greenhouse gas emissions (indirect emissions from electricity generation purchase) is 0.34 tCO2eq.

The total SCOPE 3 greenhouse gas emissions (indirect emissions related to the value chain) is 36.62 tCO2eq.

The percentage of GHG reduction compared to the previous year is 20%.

The company measures the carbon footprint of its products/services and reports this in the table below:

PRODUCT/SERVICE	Value (tCO2 eq)
Trade sector: Reselling electronic components	0,84 tCO2 eq

The company's means are: I 2 Diesel vehicles, 1 Petrol vehicle, 17 Hybrid vehicles.

The analysis and data collection systems used by the company are able to return information on the climate-altering gas emissions produced.

As part of its activities, the company uses cooling and/or refrigeration systems. The company is in compliance with the renewal of its refrigeration systems taking into account the new limits set for 2022 by the EU F-Gas Regulation on fluorinated greenhouse gases.

Waste

GRI 306-1 • GRI 306-2 • GRI 306-3

In the context of the GRI Standards, the environmental dimension of sustainability concerns the **impacts** of an organisation on living and non-living natural systems, including soil, air, water and ecosystems. This includes the **issue of waste**, which may be generated by the organisation's own activities, but may also be generated by upstream and downstream actors in the organisation's value chain.

Waste, therefore, can have **significant negative impacts on the environment and human health** if poorly managed.

The total waste produced in one year by the company is 79.68 tonnes. Steliau Technology Italy carries out separate collection at its sites; in particular, it separates:

- Ø paper,
- Ø plastic,
- Ø glass,
- Somputer equipment
- Ø other material, such as garden waste resulting from on-farm landscaping.





Steliau Technology Italy pays attention to recycling practices.

Within the offices, special areas are set aside for the separate collection of waste produced during all phases of the handling of goods.

In addition, the offices of the catering-breafi area are equipped with filtered water dispensers that allow employees to conveniently fill their own aluminium bottles provided by the company. In this way, there is a total absence of plastic water bottles.



FOCUS Sustainable and net zero carbon headquarters

66 A tangible contribution to Steliau Technology Italy's renewed commitment to sustainability

The new headquarters of Steliau Technology Italy has been inaugurated and is now operational: **OPEN 336**. This innovative and comfortable workspace has great potential and embraces the 3 pillars of sustainability.

The building is virtuously developed in such a way as to achieve a net zero air emission over its lifetime. In addition, it has been structured in such a way as to offer a not inconsiderable level of daily well-being and working comfort.

The structure is in fact undergoing Well certification, (Well Building Standard[™]) which, as the word itself suggests, aims to define a standard of wellbeing conditions for occupants in a building.

It is equipped with a photovoltaic system with a capacity of 30.34 kWp, consisting of 78 panels covering an area of 155 square metres. This is complemented by a 30 kW inverter, a heat pump and two heat exchangers.

The site is also LEED certified: a voluntary system for the design, construction and management of sustainable buildings and high-performance land areas that promotes an integrated design system covering the entire building. Equipped for electric vehicle recharging and logistically located in an area convenient for travel by public transport or bicycle and pedestrian, OPEN 336 is a flagship of the North Milan area, also thanks to its proximity to the North Park and several municipal gardens.



Project SDGs

The Project is in line with three of the 17 Sustainable Development Goals (SDGs) recognised by the United Nations under Agenda 2030.



Environmental Impacts, SASB and GRI Standards

Environmental impacts, as defined by the Taxonomy Regulation, indicate the environmental sustainability of investments. SASB materiality allows the ESG impacts of activities to be identified, managed and reported. The GRI Standard provides the parameters for reporting these impacts.

Environmental Objectives (formerly Taxonomy Reg.)
1) Climate change mitigation
2) Adaptation to climate change
5) Pollution prevention and reduction

SASB project materiality	GRI
Greenhouse gas emissions	305-1, 305-2, 305-5
Air quality	305-3
Employee Health and Safety	403-6
Professional Ethics	2-25, 307, 419

FOCUS 100% renewable energy

The Project

Steliau Technology Italy has obtained authorisation from the owner of the **Renewable Energy Trademark, Enel S.p.A.**, to use it to increase the transparency of its corporate communications.

The Renewable Energy Mark provides the signatories of the existing contract with a certificate of their care for the environment and the guarantee that the energy supplied by Enel Energia in relation to the signed contract comes from renewable sources, such as wind, photovoltaic, solar thermal, geothermal, hydroelectric energy, and also energy produced using tides and waves, biogas and biomass.

The company therefore, since it purchases certified energy sources, presents itself as a sustainable entity. Thanks to the certification of the energy service provider's 'guarantee of origin' system, in accordance with EC Directive 2009/28/EC, Steliau Technology Italy's virtuousness in corporate energy management is indisputable.



Project SDGs

The Project is in line with four of the 17 Sustainable Development Goals (SDGs) recognised by the United Nations under Agenda 2030.



SASB and GRI Standards

Environmental impacts, as defined by the Taxonomy Regulation, indicate the environmental sustainability of investments. SASB materialities allow the ESG impacts of activities to be identified, managed and reported.

The GRI Standard provides the parameters for reporting these impacts.

Environmental Objectives (formerly Taxonomy Reg.)
1) Climate change mitigation
2) Adaptation to climate change
5) Pollution prevention and reduction

SASB project materiality	GRI
Reducing GHG emissions	305-5
Reducing energy consumption	302-5
Professional Ethics	2-25, 307, 419





Employment

GRI 2-24 • GRI 2-25 • GRI 2-7 • GRI 2-30 • GRI 3-3 • GRI 401-2 • GRI 403-1 • GRI 403-6 • GRI 403-9 • GRI 405-1 • GRI 405-2 • GRI 406-1 • GRI 408-1 • GRI 409-1 • GRI 412-1

Fundamental is to understand the **organisation's approach** to employment and job creation, as well as to recruitment, selection and retention of personnel and related practices, including the working conditions it offers.

The **stability of its workforce from a contractual point of view**, linked to internal welfare policies, is a key element for the organisation to **ensure high productivity performance**.

An appropriate working environment that fosters social inclusion and work-life balance of employees, values diversity and offers equal opportunities, accompanied by welfare tools, improves company performance and strengthens the organisation's ability to adapt to extraordinary events.

The company monitors its sustainability performance with appropriate quantitative indicators: it monitors performance related to social management (including employee management). The company conducts its business by applying a system for managing the safety and health of its employees. Steliau Technology Italy has nationally or internationally recognised third-party certifications for the safety and health protection of its employees.

EMPLOYEES	Number Women	Number Men
Managers	0	7
Middle-managers	1	8
Employees	26	10
Average salary	30.463€	33.360€

The percentage difference in annual basic salary per most represented occupational category between men and women is 10%.

The average age of employees is over 50. The percentage of total employees with part-time contracts is 6%. The company hired, out of the total number of staff, 6% of employees belonging to the protected categories ex 68/99 or disadvantaged persons ex L.381/91.

Accidents occurred in the current year are less than or equal to 3. Accidents occurring last year are less than or equal to 3. The accidents that occurred two years ago are less than or equal to 3.

The total number of days lost in the current year due to accidents resulting in temporary incapacity for work was less than or equal to 10.

The total number of days lost last year due to accidents resulting in temporary incapacity for work was less than or equal to 10.

The total number of days lost two years ago due to accidents resulting in temporary incapacity for work was less than or equal to 10.

The total average number of hours worked over the past year was 85,581. The company created 10 new jobs over the past year. The company applies the C.C.N.L. Commerce Tertiary Sector.

The company publishes the EDI policy covering discrimination on the basis of gender, race, religion, sex or sexual orientation on its website at linfi www.specialind.it, and commits to adopting the UN Global Compact 'Manifesto' companies for people and society.





The company makes welfare available to its staff::

- Productivity bonuses,
- Hourly flexibility/smart working,
- Agreements with local businesses (fuel vouchers/spending vouchers/discounts),
- A person in charge of welfare in the company.

The company measures the degree of satisfaction of its employees through a regular, periodic survey. The company makes its human rights management policy public on its website.

Training

GRI 403-5 • GRI 404-1 • GRI 404-2

The development and **maintenance of professionalism and competencies** are conditions that enable companies to pursue their **strategic objectives** of creating value for the organisation.

The number of hours spent on training courses during the last year was 570.

During the year, the main topics of the training provided included:

- Health and safety at work;
- **Solution** Fight against corruption;
- **Orivacy (ex Gdpr)**;
- **Over Servironment;**
- Scheme Language courses;
- **Marketing**.

The company has certified sustainability specialists in its workforce. In fact, it has sustainability specialists, Sustainability Managers, on its staff.





FOCUS 'Business for People and Society' Manifesto

Steliau Technology Italy, in 2023 signed the **Manifesto 'Business for People and Society'** committing to strengthen the role of the Social dimension in business strategies to generate long-term value also in the supply chain and in the communities where it operates.

In fact, the company manages the economic, social and environmental impacts of its activities, also by adapting and encouraging the adoption of ethical behaviour within its own reality.

The Manifesto is the text addressed to companies and drafted by the UN Global Compact Network Italy, the local network of the UN Global Compact, the world's largest corporate sustainability initiative.

In this regard, Massimo Loche, CEO of Steliau Technology Italy, said:

"Signing the Manifesto reflects our commitment to promoting ethical values, corporate social responsibility and sustainability at all levels of our operations. We believe that the 10 principles of the Manifesto 'Businesses for People and Society' represent a fundamental guideline for companies operating in a responsible and sustainable manner, with the conviction that such adherence will allow us to contribute to making the world a better place".

Massimo Loche

CEO Steliau Technology Italy



Project SDGs

The Project is in line with 6 of the 17 Sustainable Development Goals (SDGs) recognised by the United Nations under Agenda 2030.







Customer relations

GRI 416-1 • GRI 417-1 • GRI 418

In terms of customer relations, it is of great importance how the **company considers the impacts on the health of its customers**, starting with the products and services it markets, and how these impacts are assessed in the different phases of the **life cycle of its business**. Steliau Technology Italy is committed to guaranteeing to manufacturers, electronic components that meet the required compliance requirements and are in line with what has been ordered and certified. In fact, the incoming phase is performed in accordance with the ISO 9001/9120 standard QMS Quality Management Manual.

The same impact is to be found in **all phases of the company's business**, because the products are marketed and are supplied from the supplier's catalogue or to customer specifications and are sourced from leading manufacturers, both European and overseas, carefully selected for their product reliability and ability to meet customer requirements.

In this logic, **the initiatives taken** by the organisation to address health and safety during the entire life cycle of a product or service and the **evaluations pertaining to this issue become relevant**.

The company has a data privacy policy in compliance with GDPR Regulation 2016/679:

- applies control plans during all stages of product handling, from arrival at the warehouse, to their delivery, so as to ensure their conformity.
- As a stock-monitoring plan that allows products that have been in storage for the longest time to be sold/delivered first, thus reducing the risk of spoilage and/or deterioration due to long storage.

The products supplied are accompanied by appropriate labelling/information on disposal practices for additional packaging.

Steliau Technology Italy has also adhered to the Manifesto 'Business for People and Society', the text addressed to companies and drafted by UN Global Compact Network Italy, the local network of the UN Global Compact, the world's largest corporate sustainability initiative.

By signing the Manifesto, Steliau Technology Italy commits to strengthen the role of the Social dimension in its business strategies to generate long-term value also in the supply chain and in the communities where it operates. The Manifesto is available here: https://www.globalcompactnetwork. org/en/activities-at-network-ita/manifesto-enterprises-for-people-and-society.html

The management of Steliau Technology Italy demonstrates its customer focus by ensuring that:

- S the requirements, needs and expectations of the customers and the applicable mandatory ones;
- related risks and opportunities are defined and addressed;
- S the focus on increasing customer satisfaction is maintained;
- particular attention is also paid to both product conformity and adherence to delivery schedules, and action is taken if planned targets are not met.

Infrastructure investments and funded services GRI 203-1

The economic dimension of sustainability concerns the impacts of an organisation on the economic conditions of its stakeholders. It also concerns the impacts of an organisation on local, national and global economic systems.

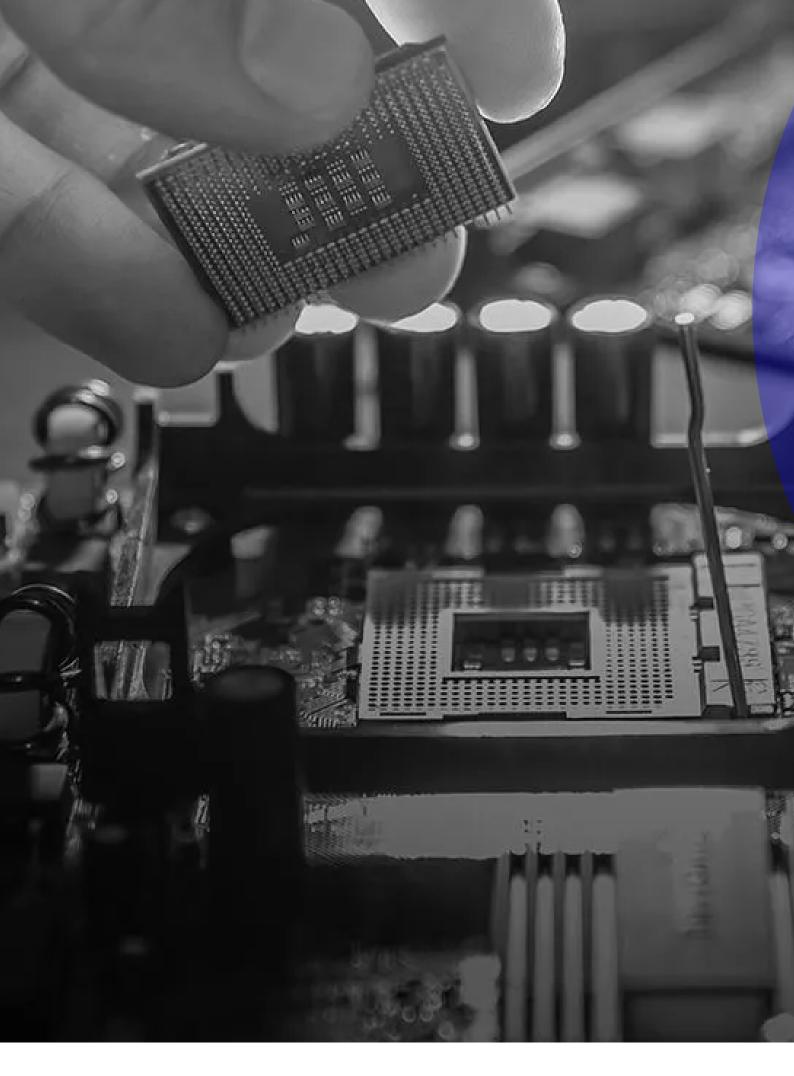
Economic impact can be defined as a change in the productive potential of the economy, which has an influence on the well-being of a community or stakeholders, as well as on long-term development prospects.

When we speak of indirect economic impacts, we refer to the consequences of financial transactions and the flow of money between an organisation and its stakeholders and are particularly important when assessed in relation to the improvement of stakeholder conditions, not only directly related to the company's own activities, but connected to the further impacts these may have.

The investments made by the company respond to national and international sustainable development objectives. Investment, innovation, technology development and the pursuit of quality are key elements in economic strategies, as they create areal multiplier effect benefiting a wide range of stakeholders.

Donations/sponsorships/liberations were made for the benefit of the community in the area in which it operates, totalling €2,700.







Business Model and Innovation

Suppliers and practices of supply

GRI 2-24 • GRI 2-25 • GRI 2-27 • GRI 204 • GRI 204-1 • GRI 308-1 • GRI 308-2 • GRI 414-1 • GRI 419-1

Within the framework of the organisation's relations with its suppliers, an extremely important chapter concerns their **social evaluation**, by which is meant the commitments that **suppliers make in terms of sustainability and behaviour consistent** with these issues.

With a view to **constant improvement** of impacts and mitigation of negative ones, the organisation is increasingly inclined to assess compliant supplier behaviour in terms of **social, economic and environmental impacts** as these impacts are directly and indirectly reflected on the company's own value chain.

Therefore, on the one hand, the organisation is driven to **monitor the behaviour of suppliers** and, on the other hand, to define **strategies and actions to limit** the scope of those with negative impacts.

The company conducts its business by applying a system for the management of supply relationships. Steliau Technology Italy adopts a system for evaluating suppliers, in particular:

Suppliers assessed for possession of environmental certifications 50%

Suppliers assessed for possession of social certifications (health and safety) 50%

The company certifies its quality management system, having obtained ISO 9001-AS9120 certification.

Steliau Technology Italy trades goods whose traceability is guaranteed in certain respects:

- Product characteristics (e.g. conformity of the product with the manufacturer's original catalogues and/or technical specifications);
- Compliance with technical specifications and compliance with laws and regulations (e.g. Reach, Rohs, Conflict Minerals).



To monitor and control the status of products for sale/distribution, the company uses special technologies to monitor incoming goods.

The company invests in activities with a focus on sustainable innovation of logistics processes, in particular logistics is taken care of by Fercam Spa, through a certified ESG system (see Fercam Spa website: https://www.fercam.com/it-it/azienda/qhse/ambiente-e-sostenibilita-151.html).

The company invests in activities with a focus on sustainable innovation in logistics processes. These activities include:

- Sustainable logistics with Fercam Spa
- **O** Net Carbon Zero building, reducing emissions by 100%
- **Solution** LEED certification, Platinum level
- **W** The next WEEL Gold certification
- The smoke detection, EVAC and sound system Energy Class A.



Packaging is procured from a third company.

The company has initiated supply chain collaboration processes with a view to the circular economy, i.e. to minimise the consumption of natural resources and waste.

Steliau Technology Italy works with its supply chain to promote and guarantee the sustainability of its product offering according to nationally and/or internationally recognised voluntary protocols and standards. The methods and standards followed are, in particular, meetings and collaborations according to the principles of consumption reduction and efficient use of resources, reuse of products and materials.

In order to optimise the supply of goods according to demand (market demand), the company plans its goods management with a view to reducing waste.

In the search and selection of suppliers, their commitment to the circular economy is evaluated and rewarded.

The selection of suppliers for packaging takes into account criteria of increased recyclability of packaging.



Leadership and Governance

STA



Governance

GRI 2-9 • GRI 2-28

The **organisation's governance structure**, composition, knowledge and roles are important to understand how the management of the organisation's impacts on the economy, the environment and people, including the impact on their human rights, is **integrated into the organisation's strategy and operations**, and how well the company itself is 'equipped' to oversee the management of impacts.

The corporate governing body is represented by a Board of Directors.

The Board of Directors consists of 3 to 5 persons. The Board of Directors has up to 3 independent members.

The presence of women on the governing body is less than 33%. The average age of the governing body is between 30 and 50.





The company is a member of trade associations: it is a member of Assodel and Assolombarda.

Professional Ethics

GRI 2-22 • GRI 2-23 • GRI 2-25 • GRI 307 • GRI 419

The organisation's commitments must be aimed at **responsible business conduct**, including a commitment to **respect human rights**. These commitments constitute the company's values, principles and standards of behaviour and the mission embedded within its business objectives.

The human rights enshrined in national and international standards, coupled with the **organisation**'s actions **to prevent** or **mitigate potential negative impacts** for each material issue are the grid through which the company's activities must pass, considering political commitment as an integral part of corporate strategy. It is therefore appropriate for the company to **identify its risk factors** and equip itself with strategic tools to address them.

The company considers social and environmental impacts among the company's risk factors and manages regulatory risks.

The company implements sustainability initiatives and/or has a formalised sustainability mission and/or strategy to manage the economic, social and environmental impacts of its activities. In particular, the mission takes into account environmental and social factors that are also considered in the long-term strategy.

Steliau Technology Italy has appointed a person dedicated to sustainability.

The company carried out an assessment of the socio-environmental impacts of its logistics chain. The elements considered in this analysis concern the type of vehicles used and the maintenance of working hours within legal limits.



Regulatory Compliance

GRI 2-22 • GRI 2-25 • GRI 3-2 • GRI 307 • GRI 419

The compliance of an organisation indicates the ability of its governing bodies to ensure that operations comply with certain performance parameters or universally recognised standards. In this context, obtaining certifications attesting to the high degree of compliance of a company's activity, sector or procedure becomes a guarantee in the eyes of stakeholders and those directly or indirectly involved in the company's value chain, with a view to reducing or mitigating negative impacts on particular sustainability related issues, thus in the social, environmental and economic spheres.

The company will publish its environmental and social sustainability results in a special report, starting in 2022.

Steliau Technology Italy has nationally or internationally recognised third-party certifications for the quality of its products/services and the quality of corporate management. Specifically according to the relevant topics, the entities are:

- Senvironment: Synesgy,
- Safety at Work: ARISTEA/Legnano,
- Quality: DNV/Accredia ISO 9001:2015 and AS/ EN9120:2018,
- Anti-corruption: T.Compliance already Trace International (https://www.tcompliance.com/due-diligence-risk-assessment).
- Adaptation to the Whistleblowing legislation by setting up an internal whistleblowing channel called 'Parrot Whistleblowing WB, as of 17 December 2023, pursuant to Legislative Decree 24/2023 (for further information https://www.steliau.it/it/governance/ wistleblowing).

The company has internal controls, in particular:

- 🞯 An Internal Audit function,
- A Board of Auditors,
- Internal audits according to ISO 9001:2015,
- Audits for the Safety System L.81/2008.

Regarding the European Commission's goal of ensuring that all packaging in the EU is reusable or recyclable by 2030, the company has implemented an aligned business plan.

In particular, the company has already complied with the Environmental Labelling of Packaging according to Article 219 of Legislative Decree 152/2006 - Decision 129/97/EC and transposition with Legislative Decree 116/2021.

Anti-Corruption and Fiscal Governance

GRI 2-24 • GRI 205

In the company's operations, it comes into contact with a multiplicity of subjects: stakeholders, managers, employees, creditors and all other subjects whose interests are linked to the life of the company. It is therefore essential, when regulating these aspects, to define those practices that constitute corruption risk situations.

By means of organisational models adopted by the company and internal/external procedures for mapping these risks, the company puts in place a series of strategies and initiatives to reduce or even completely eliminate cases of corruption. This normally takes place through an analysis of the entire corporate organisational structure and its internal control system, in order to verify its suitability for crime prevention purposes.

Steliau Technology Italy carries out its activities by applying a system for the management and prevention of corruption.

The company holds the TRACE-TCompliance certification, which is a comprehensive and highly comparative duediligence review, analysis and approval process. Obtaining this means that Steliau Technology Italy has been thoroughly audited, trained and certified by the world's leading anti-corruption standard-setting organisation TRACE-TCompliance.





FOCUS Whistleblowing platform implemented

Steliau Technology Italy guarantees a working environment in which it is possible to freely report any unlawful behaviour within the company. As of 17 December 2023, in fact, pursuant to Legislative Decree 24/2023, Steliau Technology Italy has set up an internal wrongdoing reporting channel called **"Parrot Whistleblowing WB"**. The methods by which to access and use the platform were communicated to all staff, who also participated in a dedicated on-line training course "WHISTLEBLOWING AND COMPLIANCE IN THE PROTECTION OF PERSONAL DATA".

Corporate compliance allows all employees and/or collaborators to report any illegal activities encountered during work processes, guaranteeing confidentiality and protective measures to the reporter.

In January, the consultancy company trained the staff through an in-depth online training on the implementation of the Whistleblowing reporting platform.



Project SDGs

The Project is in line with 6 of the 17 Sustainable Development Goals (SDGs) recognised by the United Nations under Agenda 2030.







Landing page



Communication of the company's sustainable practices is one of the cornerstones that makes the company legitimate and appreciated in the market and within its supply chain.

In fact, merely professing to be an environmentally aware and socially committed company is not enough to obtain the right recognition from stakeholders. The necessary step is in fact at this point, that of communication.

Clear, transparent and widespread communication is the way in which the company exposes itself and expresses its objectives, achievements and actions to those directly concerned through various channels. The **Steliau Technology Italy** website is up-to-date and serves as a reliable reference point precisely because of the above-mentioned premises.





Actions recommended by Synesgy



Business and corporate governance

- Considering socio-environmental impacts among the corporate risk factors, in addition to the regulatory ones.
- Increase the presence of women in corporate governance bodies.
- Apply an energy management system.

Water, energy and waste

• Offer their employees incentives (e.g. season tickets/conventions) to encourage the use of public transport or eco-friendly vehicles to get to work.

Environmental Certifications

- Adopt ISO 14001 certification on environmental management.
- Adopt ISO 50001 certification on energy management systems.



Personnel Management, Certifications and Standards

- Adopt OHSAS 18001 or UNI EN ISO 45001 certifications for worker health and safety management.
- Implement a policy aimed at equal pay for men and women.
- Adopt ISO 26000 certification on corporate social responsibility.



Relationship with Stakeholders and the Territory

- Carrying out projects in schools or the community on sustainability issues.
- Initiate collaboration processes with the supply chain but also with actors outside the sector and the supply chain.
- Consider joining protection consortia.
- Initiate collaborative processes along the supply chain/industry to minimise resource consumption and waste.



Regulatory Certifications

• Have a code of ethics that includes references to sustainability issues.

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Declaration of use

Steliau Technology Italy has reported with reference to the GRI Standards for the period 1/1/2023 to 31/12/2023.

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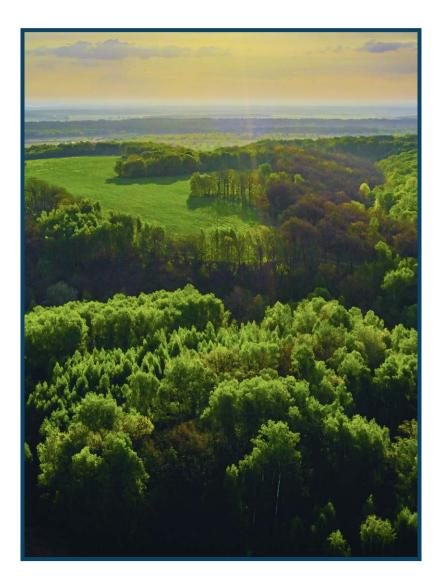
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