

ESG POLICY

Environmental - Social - Governance

Bruno Generators Group (BGG)

Document drawn up on the basis of the Group's 2024 ESG Report, the published compliance safeguards and the supplementary information provided

Foreword

This ESG Policy defines the framework of principles, responsibilities, priorities and indicators through which BGG integrates sustainability into the governance of the Group. The policy is built consistently with BGG's industrial model: power generation, BESS systems, rental, technical services and product innovation oriented towards efficiency, operational continuity and a lower environmental impact.

1. Purpose, scope of application and general principles

BGG considers sustainability an integral part of its industrial development model. The purpose of this ESG Policy is to establish clear and shared guidelines for managing the Group's environmental, social and governance impacts in a structured way, while promoting the creation of lasting value, risk management and transparency towards stakeholders.

The policy applies to BGG S.p.A. and, according to a criterion of progressive extension and harmonisation of safeguards, to the Group's subsidiaries and operating companies, as well as to those acting in the name or on behalf of the companies: directors, executives, employees, collaborators, partners, strategic suppliers and business counterparties.

The guiding principles of this policy are: integration of sustainability into decision-making; regulatory compliance; centrality of people; responsible innovation; risk prevention; measurability of performance; continuous improvement.

2. External references and link with internal safeguards

The policy is consistent with the main international references applicable to the Group's manufacturing and industrial context: the GRI Standards, the GHG Protocol, the 2030 Agenda and the United Nations Sustainable Development Goals, the OECD Guidelines for Multinational Enterprises and the evolving principles of the Corporate Sustainability Reporting Directive (CSRD).

It is also coordinated with the governance and compliance safeguards already adopted by the Group, in particular:

- ☐ the Group Code of Ethics, as the reference for fairness, integrity, loyalty and responsibility in internal and external relations;
- ☐ the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001 and the related Supervisory Bodies, as a safeguard for crime prevention and control of sensitive processes;
- ☐ the Whistleblowing system and reporting channels, as a tool for bringing non-compliant conduct to light and protecting the reporting person;
- ☐ certified management systems, including quality, environment, health and safety, energy, anti-corruption and gender equality, adopted by the Group's main companies;

The policy does not replace these instruments, but integrates them into a unified ESG framework, with the aim of ensuring consistency between strategy, compliance, operational management and reporting.

3. BGG's industrial identity and ESG rationale

BGG is an industrial group active in the design, manufacture, testing, distribution and rental of solutions for power generation and operational continuity, including generating sets, lighting towers, BESS systems, security systems and special solutions. For BGG, sustainability is therefore not an ancillary matter, but an element directly connected to the core of the business: product efficiency, safety of use, continuity of service, technological innovation, environmental stewardship and responsibility towards the local area.

The Group's positioning in fact requires reconciling two needs: on the one hand, guaranteeing reliable and timely energy in critical contexts; on the other, contributing to the transition towards increasingly efficient, hybrid, electrified and lower-emission solutions. From this perspective, sustainability is seen as a lever for competitiveness, resilience and technological differentiation.

4. Material topics and stakeholders

The 2024 ESG Report identifies for BGG a set of material topics that represent the substantive basis of this policy: energy and energy efficiency, product efficiency, atmospheric emissions, waste and the circular economy, welfare and workplace well-being, health and safety, product quality and safety, business ethics and integrity, responsible supply chain management, innovation and research, risk management and the fight against corruption.

Key stakeholders include: employees and collaborators; customers and distributors; suppliers and technical partners; investors, banks and shareholders; local communities; trade associations; academia; institutions and the public administration. BGG is committed to maintaining a structured dialogue with these interlocutors, proportionate to the relevance of the topic and the level of impact generated.

Stakeholder	Main expectations	Method of oversight / dialogue
Group people	Safety, development, fairness, stability and listening	Training, welfare, H&S systems, D&I initiatives, internal communication
Customers and distributors	Quality, reliability, technical support, innovation	Customer care, testing, feedback, commercial and after-sales activities
Suppliers and partners	Fairness, continuity, contractual clarity, shared growth	Supplier qualification, procurement procedures, assessments and periodic dialogue
Communities and institutions	Positive impact on the local area, legality, environmental stewardship	Local relations, donations, events, compliance and transparency

5. Sustainability governance and internal responsibilities

The CEO Renato Bruno and top management ensure the operational implementation of the approved guidelines, promote alignment between the companies within the perimeter and support the spread of a managerial culture oriented towards responsibility, measurability and continuous improvement.

The ESG Manager and the Group ESG Team coordinate the data collection process, KPI monitoring, the preparation of reporting content, dialogue with company functions and the progress of cross-functional initiatives. The HSE, HR, Operations, Finance, Procurement and R&D functions each contribute within their respective areas of expertise.

Role	Main responsibilities	Frequency / output
CEO / top management	Implementation of guidelines, allocation of resources, integration into industrial plans	Continuous monitoring and management reporting
ESG Manager / ESG Team	KPI coordination, reporting, cross-functional initiatives, support to the companies	Periodic oversight, data collection and progress of plans

Role	Main responsibilities	Frequency / output
Operating functions	Execution of environmental, social and compliance actions	According to functional processes and plans

6. Environmental commitments

6.1 Product, innovation and energy transition

BGG is committed to directing research and development towards solutions that increase the energy efficiency of its products, reduce consumption and improve compatibility with energy transition trajectories. This framework includes the development of the Fusteq line, BESS systems, hybrid solutions and hydrogen-related projects, with the aim of offering the market reliable, high-performing and progressively lower-impact solutions.

6.2 Site efficiency and energy management

The Group promotes the efficient use of energy at its production and service sites, through management systems, consumption monitoring, investments in efficiency improvements and progressive self-generation from photovoltaics where technically and economically sustainable. Energy is treated as a critical industrial variable: it must be measured, analysed and governed rigorously, also in relation to changes in the corporate perimeter.

6.3 Emissions, climate and use of resources

BGG monitors direct and indirect emissions with an approach consistent with the GHG Protocol, prioritising action on the most significant factors of its emissions profile. The Group is also committed to progressively improving waste management, increasing material recovery, limiting waste and promoting circular-economy practices in production and maintenance processes.

6.4 Operational environmental commitments

- ☐ improving the energy intensity of sites and processes, with continuous monitoring and priority given to actions with the greatest environmental and industrial return;
- ☐ reducing, for the same level of activity, the consumption and emissions associated with testing, thermal processes, fleets and utilities;
- ☐ increasing self-generation solutions and electric mobility solutions compatible with the Group's operations;
- ☐ improving waste management and promoting recovery, traceability and the correct separation of the various waste streams;
- ☐ taking into account the environmental impact across the product life cycle, with particular attention to efficiency, maintenance, durability and safety of use.

7. Social commitments

7.1 Health, safety and well-being

BGG considers the protection of health and safety a non-negotiable value. The Group is committed to systematically overseeing hazard identification, risk assessment, training, occupational medicine, accident analysis and the adoption of preventive and corrective measures. Safety is part of the way of working, not a formal obligation.

7.2 People, skills and development

The Group's growth requires constantly evolving technical and managerial skills. BGG therefore promotes continuous training, know-how transfer, the development of young talent, professional updating and empowerment paths consistent with the Group's industrial and organisational evolution.

7.3 Gender equality, inclusion and respect

The Group promotes a culture of respect and equal opportunities, rejects any form of discrimination and values diversity as an element of organisational quality. In line with the information provided by the client and with the path undertaken by the Group, the main operating companies include entities certified under UNI/PdR 125:2022 for gender equality, including BGG Spa, Tecnogen Spa, Milantractor Spa, Bruno Srl and Powertronix Srl.

7.4 Communities, schools and the local area

BGG recognises its local roots and fosters initiatives that generate shared value: collaborations with schools, higher technical institutes (ITS) and universities; career-guidance and job-placement projects; support for associations and social, cultural and sporting events; contributions to solidarity and civil protection initiatives. The Group's social commitment aims to strengthen skills, employability and a positive relationship with the areas in which it operates.

8. Governance commitments

8.1 Ethics, legality and business integrity

BGG operates in compliance with the laws, applicable regulations and the principles of its Code of Ethics. The Group rejects unfair practices, favouritism, unmanaged conflicts of interest, discriminatory behaviour and any form of corruption or abuse. Business integrity is a precondition for sustainability and an essential requirement for the Group's reputation.

8.2 231 Model, whistleblowing and controls

The 231 Model and the Supervisory Bodies represent a structural safeguard of corporate governance. The whistleblowing system allows the reporting, including on a confidential basis, of non-compliant or unlawful conduct or conduct contrary to company principles, ensuring protection of the reporting person and proper handling of reports. The Group's companies are called upon to cooperate actively with controls and to foster the spread of a culture of compliance.

8.3 Anti-corruption, supply chain and data

BGG promotes transparent relations with customers, suppliers, intermediaries, consultants, partners and the public administration, with particular attention to the most exposed processes. The Group is also committed to progressively integrating ESG criteria into supply chain management, into the selection of strategic suppliers, into the protection of human rights, into data protection and information security.

- ☐ adoption of conduct consistent with the anti-corruption systems and with internal authorisation safeguards;
- ☐ traceability of decisions and of the main documentary evidence in sensitive processes;
- ☐ promotion of criteria of fairness, quality, safety and social responsibility in the supply chain;
- ☐ attention to the confidentiality of information, the protection of personal data and the correct use of company tools.

9. ESG KPI system and monitoring

To ensure that the policy is concrete, BGG adopts a system of indicators that allows environmental, social and governance performance to be monitored periodically. The KPIs listed below represent the minimum corporate

monitoring set and form the basis for reporting, review and the definition of annual objectives. The baseline values are taken from the 2024 ESG Report and shall be updated in the event of perimeter extensions, methodological revisions or the availability of more recent certified data.

Area	KPI	2024 baseline	Unit	Ref.	Oversight responsibility
E	Energy consumed within the organisation	59,020	GJ	GRI 302-1	Operations / HSE / ESG
E	Energy intensity	3.26	GJ/Euro x10,000	GRI 302-3	Finance / ESG
E	Photovoltaic self-generation	1,602	GJ eq.	Internal monitoring	Operations / HSE
E	Scope 1 emissions	3,314	tCO ₂ eq	GRI 305-1	HSE / ESG
E	Scope 2 emissions	1,019	tCO ₂ eq	GRI 305-2	HSE / ESG
E	Total waste generated	1,921	t	GRI 306-3	HSE / Operations
E	Total waste sent for recovery	85%	%	GRI 306-4	HSE / Operations
S	Employees at end of period	475	no.	GRI 2-30 / 401-1	HR / ESG
S	Average training hours	12.3	hours per empl.	GRI 404-1	HR
S	Health and safety training hours	2,770	hours	GRI 403-5	HSE / HR
S	Recordable employee injuries	12	no.	GRI 403-9	HSE
S	Employee TRIR	19.7	index	GRI 403-9	HSE / ESG
S	Women as a share of total employees	14%	%	GRI 405-1	HR / ESG
G	Whistleblowing / Supervisory Body reports	0	no.	GRI 2-16 / 2-26	Compliance / Supervisory Body
G	Confirmed incidents of corruption	0	no.	GRI 205-3	Compliance / Management
G	Companies with key ESG safeguards / certifications	annual monitoring	qualitative	Management systems	ESG / Quality / HSE

10. Guidance objectives 2025-2027

The Group defines the following medium-term orientations, to be translated annually into operational plans by company and function:

- ☐ strengthening the quality of ESG data and reporting capabilities with a view to progressive alignment with the CSRD;
- ☐ improving the energy efficiency of sites and emissions monitoring, with a focus on the most significant Scope 1 drivers;
- ☐ supporting product innovation towards BESS, hybrid, efficient and low-impact solutions;
- ☐ reducing the frequency and severity of accidents by increasing training, prevention and safety culture;

- consolidating diversity, equity & inclusion safeguards and extending good practices to the Group's various companies;
- strengthening supply chain oversight and the integration of ESG criteria into purchasing and qualification processes.

11. Implementation, communication and review

This policy is disseminated to the Group's companies, made available to management and to the competent functions and, where appropriate, communicated to external stakeholders through the company's institutional channels.

The policy is subject to review at least annually, or in any case in the event of significant changes to the perimeter, the regulatory context, the industrial strategy or the risk system. Any updates shall remain consistent with the Code of Ethics, the 231 Model, the management systems adopted and the evidence emerging from ESG reporting.

Annex - Editorial benchmarking note

In developing the structure of this policy, examples of ESG and sustainability policies of industrial and manufacturing companies were considered as an editorial benchmark, characterised by certain recurring elements: a clear definition of purpose and scope, links to internal policies, references to international standards, structuring by E-S-G pillars, roles and responsibilities, a KPI system and provision for periodic review. These elements have been adapted to BGG's structure, business and level of ESG maturity.

This document is deliberately drafted as a corporate policy: more substantive than a simple statement of values, but less operational than a procedure. Its function is to provide direction, manage expectations, clarify responsibilities and make the Group's commitment measurable.