

CONFLICT MINERALS POLICY

Rel. 0 – 01.06.2022

1. PREAMBLE

The Isoclima Group considers of great importance to ensuring that its Companies and their partners share a set of common rules, practices and principles with respect to ethics, social responsibility and protection of the environment.

Consequently, the Isoclima Group expects its Companies to establish and encourage exemplary relations with all their partners (suppliers, distributors, subcontractors, etc.) anchored in responsibility, fairness and integrity.

This Conflict Minerals Policy was adopted by ISOCLIMA to comply with international legislation that aims to avoid the use of minerals whose proceeds could finance bloody conflicts in geopolitically unstable areas such as Central Africa. The term "Conflict Minerals" can be more or less broad depending on the legislation and regulations in force.

In general, it refers to four chemical elements: gold, tantalum, tungsten and tin (also referred to as "3TG").

Based on this Policy, ISOCLIMA, which aims to operate in a socially responsible manner, undertakes in good faith not to purchase minerals that come from conflict zones.

Similarly, this Policy extends to its suppliers who, by signing the Supplier Code of Conduct, have undertaken to comply with the Group's guidelines on the matter.

2. REFERENCE STANDARDS

The regulatory context in which the "Conflict Minerals Rules" are framed is governed by the Dodd-Frank legislation and the EU Conflict Minerals Regulation (2017/821).

3. RECIPIENTS

The recipients of this Policy are ISOCLIMA employees, suppliers and sub-suppliers.

4. FIELD OF APPLICATION

This Policy applies to all Group companies and specifically: Isoclima S.p.A., Lipik Glas d.o.o., Isoclima de Mexico and Isoclima Specialty Glass LLC. Each of the companies listed above will operate in compliance with this Policy, unless first of all compliance with the national legislation in force in the country in which the Company operates, as well as Community legislation, where applicable, will prevail.

5. OPERATIVE MODES

The Group undertakes to design and develop products that do not contain Conflict Minerals and not to use in any way metals and components from the conflict areas described above.

ISOCLIMA aims to build a solid process, composed of this policy and the Supplier Code of Conduct, in order to adapt its activities to the legislation on Conflict Minerals.

Similarly, ISOCLIMA requires its suppliers not to use metals from conflict zones and to have an adequate evaluation process in order to ensure the origin of the metals used both by them and by their supply chain.

If at least one of the materials regulated by the rules relating to Conflict Minerals (and their derivatives) is contained in the products supplied, even unintentionally, the supplier must inform ISOCLIMA, through its company references, both about the presence and origin of such materials.

In case of "suspicious" origin of one or more metals covered by this Policy, ISOCLIMA suggests using a specific format.

This includes, as an example, the Conflict Minerals Reporting Template (CMRT) questionnaire drawn up by the Conflict-Free Sourcing Initiative (CFSI) and downloadable in Excel format from the website:

www.responsiblemineralsinitiative.org

(http://www.responsiblemineralsinitiative.org/media/docs/RMI_CMRT_6.01.xlsx)

The recipients, upon request, are required to provide ISOCLIMA with all the information necessary for a correct and complete evaluation. If the recipient is unable to partially or fully satisfy this Policy, he must promptly notify ISOCLIMA.

Similarly, in the event of non-compliance with the provisions of this Policy, the recipients are required to implement the necessary actions in order to achieve the standards in question.

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In the event of repeated non-compliance with this Policy, non-cooperation in the face of an explicit request for adjustment and the transmission of the requested documentation, ISOCLIMA reserves the right to interrupt and / or terminate the commercial relationship.

6. GOVERNANCE AND MONITORING

The responsibility for the implementation and dissemination of the principles contained in this Policy within the Isoclima Group is in charge to the members of the Group's Executive Committee, and in turn to all the managers and managers of each company function, with particular emphasis on the function Shopping.

7. UPDATES

This document is expected to be updated for any significant changes in the contents and in any case at least every two years. The responsibility for the audit lies with the Sustainability Director of the Isoclima Group.

Este, 01.06.2022

PAOLO CAVALLARI
(Chief Executive Officer)

