



SUSTAINABILITY REPORT 2025



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LETTER TO THE STAKEHOLDERS

Dear Stakeholders,

Every organization today faces complex challenges that require vision, adaptability, and a sense of responsibility. In this context, ISS Palumbo considers sustainability a key element of its way of operating and building value over time.

This Report outlines our approach, the initiatives undertaken, and the objectives that guide our business. It is not simply a matter of describing results and indicators, but of sharing a vision based on the search for a balance between corporate growth, attention to people, and respect for the environment.

Throughout the year, we continued to consolidate our operations, focusing our efforts on improving processes, strengthening internal skills, and adopting increasingly sustainability-oriented practices. We recognize that change requires continuity, commitment, and the ability to transparently measure progress.

For us, sustainability is a dynamic process that involves all company functions and requires the active contribution of our people, customers, suppliers, and all those who interact with us. For this reason, we place great value on discussion and dialogue with our stakeholders, which are essential for understanding expectations, identifying areas for improvement, and defining shared priorities.

With this in mind, we have started analysis and assessment of the most relevant issues for our operating environment, in order to guide future strategic decisions and further strengthen the integration of ESG principles into business processes.

We are convinced that the results achieved are the fruit of the daily commitment of our people, the trust placed in us by our customers, and the collaboration built over time with our various stakeholders. To all of them, we extend our sincerest thanks.

We look to the future with pragmatism and determination, aware of the challenges that lie ahead but also of the opportunities that can arise from responsible management focused on continuous improvement. This Report represents a proof to the path we have undertaken and an invitation to continue building sustainable value together for future generations.

Thank you for your attention and for your contributions, which, in various ways, support ISS Palumbo's growth.

Philippe Maezelle



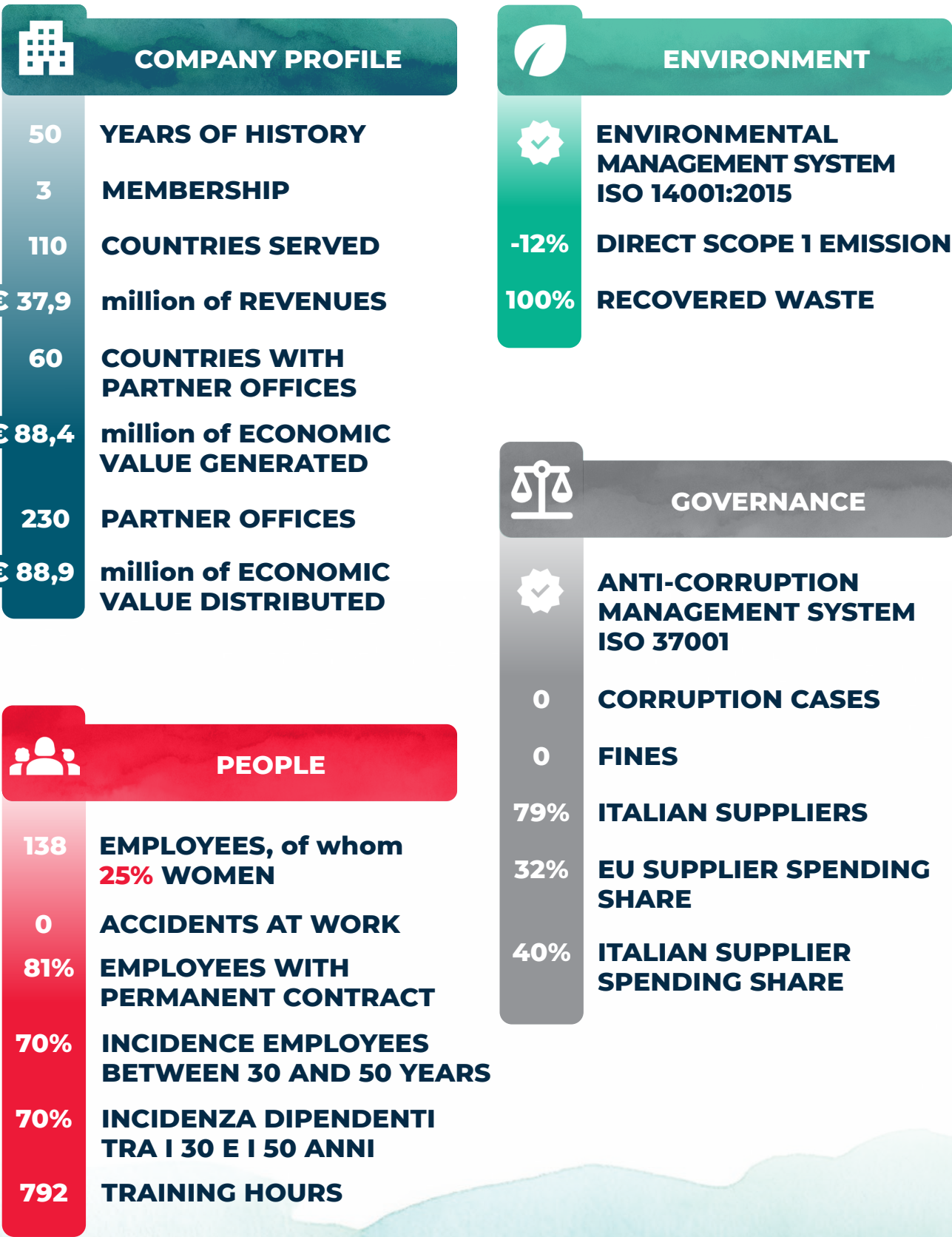
President

Filippo Palumbo



Chief Executive Officer

HIGHLIGHTS



METHODOLOGICAL NOTE

This document constitutes the Sustainability Report of ISS Palumbo S.r.l. (hereinafter also “the Company”), prepared voluntarily and therefore inspired by the principles and guidelines outlined by the European Sustainability Reporting Standards (ESRS)¹ and Legislative Decree 125/2024, implementing Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive, or “CSRD”), with the aim of ensuring structured, transparent, and consistent communication of corporate environmental, social, and governance performance.

The document has been prepared to the extent necessary to ensure the comprehensibility of the information relating to the Company’s activities, as well as the other qualitative characteristics of the Company as per ESRS 1, Appendix B, of the aforementioned European Directive.

For the 2025 financial year, the scope has been expanded compared to previous years and includes, in addition to the Italian offices already reported, the entire consolidated scope of the Group, including foreign subsidiaries and the company **Palumbo Services S.r.l.**, previously excluded from the Italian scope.

In particular, the Italian perimeter includes the following offices:

- ISS Palumbo HEADQUARTER, Via Ettore Quaglierini 6, 57123 Livorno (LI)
- ISS Palumbo, Via Aiaccia SNC, 57014 Collesalveti (LI)
- ISS Palumbo, Via Ettore Quaglierini 4, 57123 Livorno (LI)
- ISS Palumbo, Via Bruno Buozzi 5, 20049 Settala (MI)
- ISS Palumbo, Via Amada 2/4, 29010 Pontenure (PC)
- ISS Palumbo, Strada Provinciale Appia 8/10, 81100 Caserta (CE)
- ISS Palumbo, Via Volterrana 2, 56030 Terricciola (PI)
- ISS Palumbo, Via Gebbione/Contr. Torre Lupo snc, 89129 Reggio Calabria (RC)

Moreover, the perimeter includes also the Group’s foreign subsidiary companies

- ISS Palumbo Netherlands BV;
- ISS Palumbo South Africa (Pte) Ltd.;
- ISS Palumbo UK Ltd.;
- ISS Palumbo Shipping Services Llc. (Dubai);
- ISS Palumbo Mozambique Lda;
- ISS Palumbo Llc. (Russia);
- ISS Palumbo Egypt Ltd.;
- ISS Palumbo Turkey Ltd.;
- ISS Palumbo Cyprus Ltd.;
- ISS Palumbo Shipping Llc (Saudi Arabia).
- IEA Oil & Gas Logistics S.r.l

The information covers the period from January 1, 2025, to December 31, 2025, and includes both qualitative and quantitative indicators.

All limitations related to the scope or availability of data will be appropriately highlighted in the various sections of the document to guide the reader and ensure correct interpretation of the information provided.

The approach adopted to identify the ESG aspects to be reported in the Report—as deemed of priority interest by the Company—is based on the principle of Double Materiality, which includes the analysis of the significant impacts generated by corporate activities on the economy, the environment, and society, as well as the analysis of risks and opportunities related to sustainability issues that may positively or negatively influence the Company’s economic and financial performance, competitive positioning, and Enterprise Value.

To ensure the completeness, accuracy, and comparability of the information provided, the reporting is based on verifiable and measurable data, developed according to internationally recognized methodological criteria. Where applicable, any estimates and assumptions adopted are appropriately disclosed to facilitate stakeholder understanding and interpretation of the information.

The Sustainability Report disclosure was developed through an organized and structured process involving various corporate office representatives, responsible for gathering and managing the information required for the effective preparation of the document. Specifically, the representatives were involved in the main activity related to the collection of data and information to be included in the document in relation to their respective areas of expertise.

Information in relation to specific circumstances

This document is distributed to all ISS Palumbo stakeholders through publication on the institutional website at the following address: <https://www.iss-palumbo.com/>. In accordance with the requirements of Appendix C of ESRS 1, this Sustainability Report has been divided into four main sections: General Information, Environmental Information, Social Information, and Governance Information. These sections are preceded at the beginning by the Letter to Stakeholders.

¹ Defined by the European Commission Delegated Regulation (EU) 2023/2772..





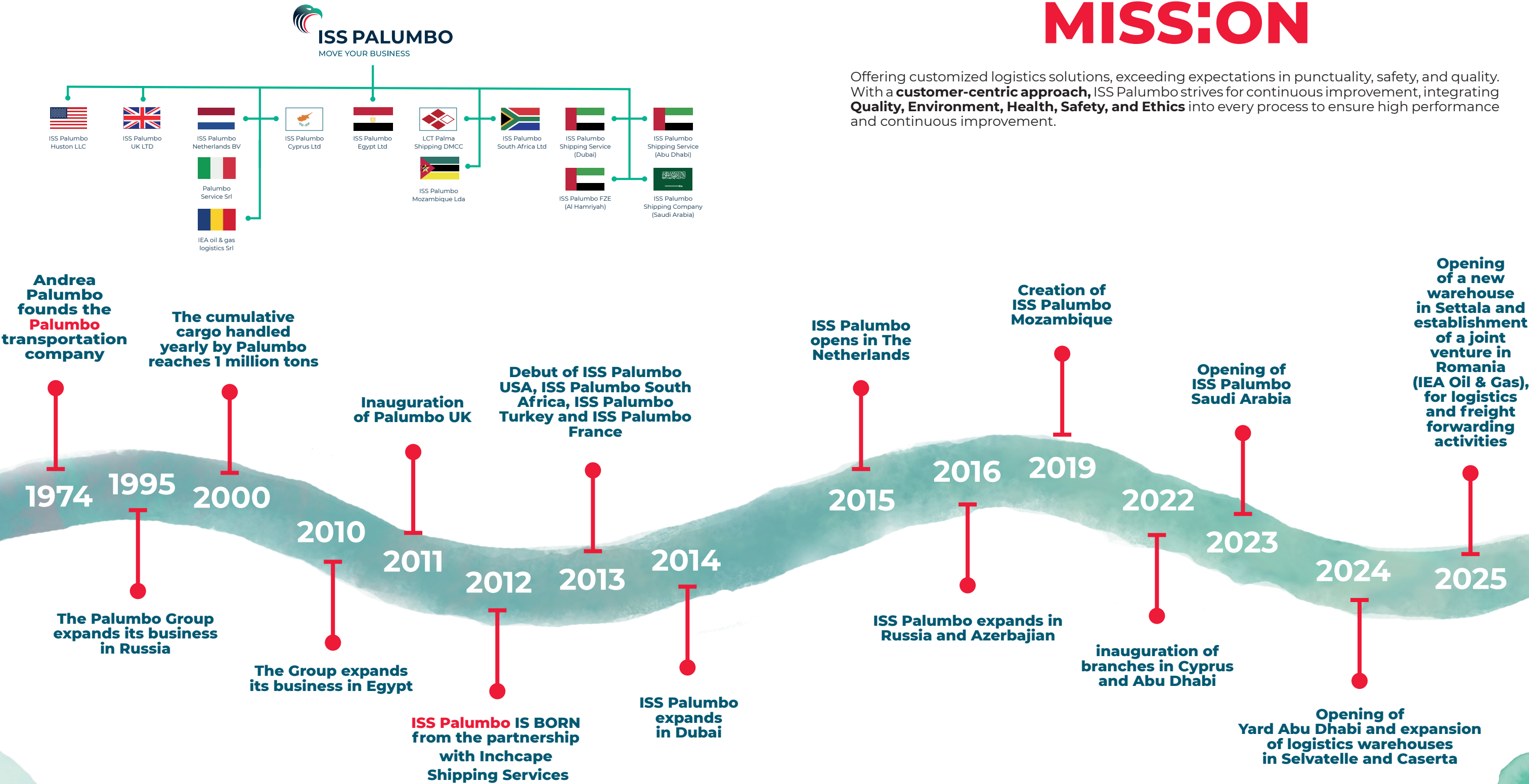
GENERAL INFORMATION

1.1 The identity of ISS Palumbo

Founded in Livorno in 1974, ISS Palumbo It is a leading provider of integrated logistics and international shipping, with a strong focus on the oil and gas sectors and exceptional maritime transport. In addition to its headquarters in Livorno, the company operates in Italy with advanced logistics hubs in Milan, Piacenza, Reggio Calabria, and Truccazzano.

Since 2012, thanks to its partnership with **Inchcape Shipping Services**, ISS Palumbo has expanded its international presence to 16 countries across Europe, Africa, the Middle East, and the Americas.

The Group is comprised of companies operating in Italy and abroad, each with a strategic role in the global business model.



VISION

To become a global benchmark in logistics by fostering a corporate culture based on innovation, teamwork, and passion. ISS Palumbo believes that **“logistics is the engine of any business”** and invests in people as a true added value, fostering skills development and strong relationships with customers and partners.

MISSION

Offering customized logistics solutions, exceeding expectations in punctuality, safety, and quality. With a **customer-centric approach**, ISS Palumbo strives for continuous improvement, integrating **Quality, Environment, Health, Safety, and Ethics** into every process to ensure high performance and continuous improvement.

1.2 Role of governance bodies

ISS Palumbo adopts a traditional governance model, consisting of a Board of Directors (BoD) and a Board of Statutory Auditors, which ensure strategic oversight, operational management, and internal control. The Company's share capital is held 51% by Inchcape Shipping Services Holdings Limited, while 49% is held by Palumbo S.p.A.

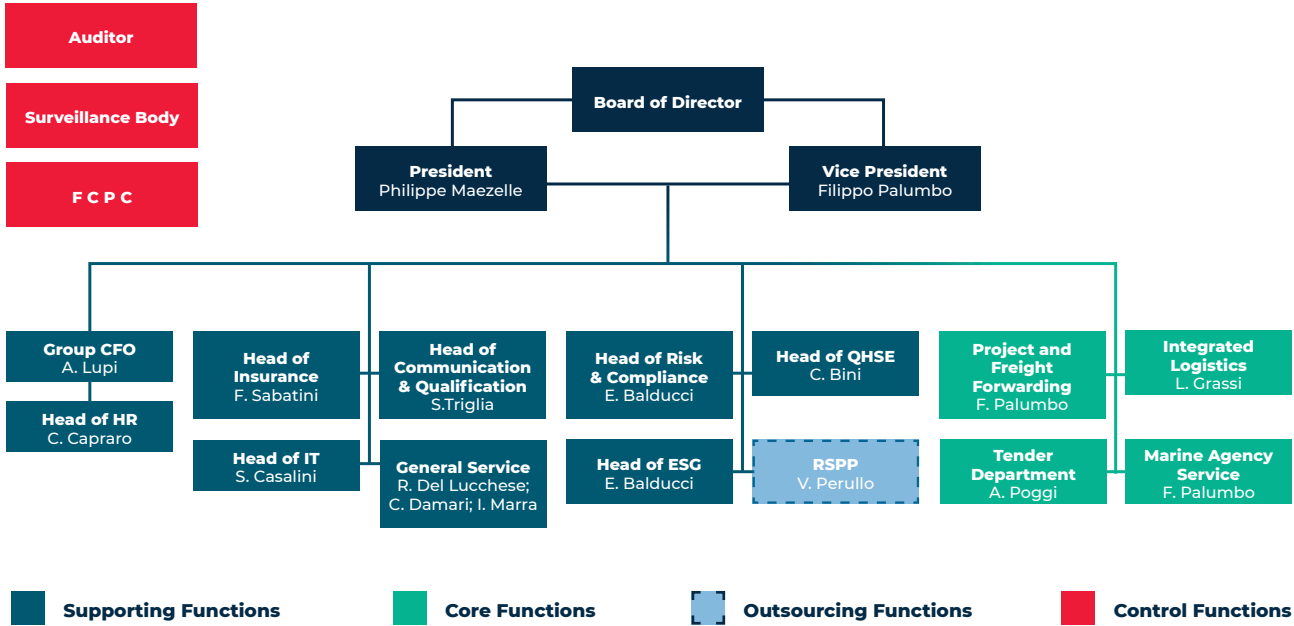
The Board of Directors defines corporate strategies and monitors their implementation, with the goal of creating long-term value. Board members have the skills and professionalism appropriate to their responsibilities, specifically possessing extensive knowledge of the industry and the services provided, knowledge consolidated through their individual professional backgrounds and tenure.

The Board of Statutory Auditors oversees the Company's administration and accounting, acting as a guarantor of legality and proper management.

GOVERNANCE BODIES BY GENDER AND AGE GROUP AT 31.12.2025	Women	Men	TOTAL	< 30 years	30-50 years	> 50 years	TOTAL
Board of Directors	2	5	7	-	3	4	7
Board of Statutory Auditors	-	1	1	-	-	1	1
TOTAL	2	6	8	-	3	5	8
PERCENTAGE	25%	75%	100%	-	38%	62%	100%

BOARD OF DIRECTORS	
President	Maezelle Philippe Richard G.
Chief Executive Officer	Palumbo Filippo
Institor	Arfani Paolo
Director	Palumbo Andrea
Director	Harmstorf Benjamin
Director	Kristensen Anders Lund
Director	Palumbo Veronica
Director	Baldoni Laura

The organizational chart is divided into “core,” “support,” and “control” functions, as illustrated in the organizational chart below. The sector managers are responsible for managing and coordinating the various company functions to ensure compliance with management systems, monitoring objectives, and continuous attention to customers, stakeholders, and their ongoing needs.



1.3 Strategy and business model

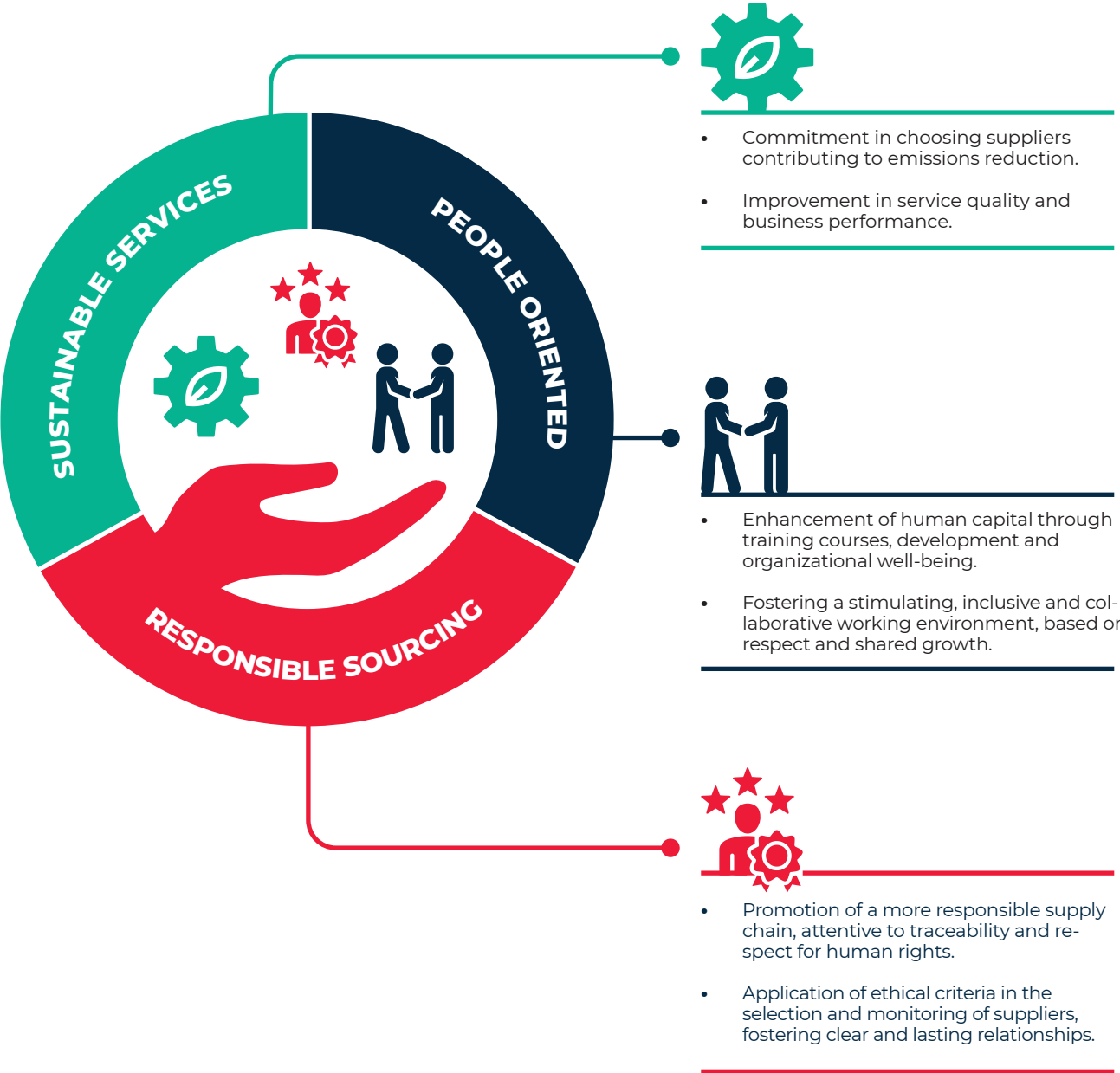
ISS Palumbo operates in the fields of national and international freight forwarding and transportation (land, sea, and air), logistics, third-party warehousing and handling, and vehicle rental. The company offers its services to large national and international companies operating primarily in the oil & gas and energy sectors, as well as to heavy industry clients.

ISS Palumbo adopts an effective integrated business model, based on the operational synergy between its various divisions—Freight Forwarding (**Project Freight Forwarding**), Logistics (**Integrated Logistics** and **Port Logistics**) and **Marine Agency Service**; This model allows it to offer highly specialized end-to-end solutions, designed to respond efficiently and in a coordinated manner to its clients' complex needs.



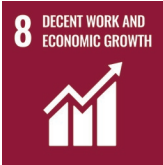
DIVISION	OPERATIONAL AREA	KEY ACTIVITIES	SECTORS SERVED
 PROJECT FREIGHT FORWARDING	National and international shipments of exceptional loads and project cargo	• Machinery/structure transport • Vessel rental • Technical-logistical studies • Energy Performance Contract (EPC) tenders and contracts	• Oil & Gas • EPC • Infrastructures
 INTEGRATED LOGISTICS	Integrated logistics and supply chain management	• Warehousing • Industrial handling	• Heavy industry • E-commerce • Energy
 PORT LOGISTICS	Port logistics for offshore projects	• Port area management • Pipeline loading • Logistics support for subsea operations	• Oil & Gas offshore
 MARINE AGENCY SERVICE	Marine agency services	• Port assistance • Customs formalities • Ancillary services (surveys, consular visas, bunkering, medical assistance, etc.)	• Shipping • Oil & Gas • Petrochemicals

The business strategy is based on success factors such as speed, responsiveness to customer needs and, more generally, the market, and the capacity for innovation. These factors contribute to offering quality and reliable services in managing customer relationships. In this context, sustainability is not only an ethical choice but also a strategic lever integrated into the business model, supporting the company's growth through responsible and forward-looking practices. Starting from this approach, ISS Palumbo has developed a sustainability path that translates into acting responsibly towards the environment, people, its customers, and the entire community, through the following strategic drivers:



1.3.1 Contribution to the Sustainable Development Goals (SDGs)

ISS Palumbo integrates principles of **responsibility, transparency, and quality** into its corporate management processes, through initiatives and tools aimed at strengthening attention to environmental, social, and governance aspects. The Company has initiated a process of analyzing and integrating the **Sustainable Development Goals** (SDGs) of the United Nations 2030 Agenda, identifying those most relevant to its operations. This process serves as a framework for guiding sustainability initiatives and monitoring areas for improvement, consistent with the company's business model.

SDG	DESCRIZIONE SDG	AZIONI INTRAPRESE
 SDG 3: Health and well-being	Assicurare la salute e il benessere per tutti e per tutte le età	• Mantenimento certificazione ISO 45001 • Revisione periodica DVR • Analisi di Risk Assessment • Iniziative di welfare aziendale
 SDG 4: Quality Education	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.	• E-learning platform accessible to all employees • Expansion of training package (hard and soft skills)
 SDG 8: Decent Work and Economic Growth	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	• Creating a safe and fair work environment • Continuous staff training • High safety standards

SDGs	TEMATICHE MATERIALI	AZIONI INTRAPRESE
 SDG 12: Responsible consumption and production	Ensure sustainable production and consumption patterns..	• SupplHI Platform • ESG supplier mapping and standards compliance audits • Maintenance of ISO 9001 certification
 SDG 13: Fight against Climate Change	Take urgent action to combat climate change and its impacts.	• Maintaining ISO 14001 certification • CarbonCare platform for calculating transportation and logistics emissions • Environmental risk assessment
 SDG 16: Peace, justice and strong institutions	Promote peaceful and more inclusive societies for sustainable development; provide access to justice for all; and build effective, accountable, and inclusive institutions at all levels.	• Promotion of corporate ethics and responsible governance practices • Whistleblower protection (Whistleblowing Platform) • Transparency in stakeholder relations • Maintenance of ISO 37001 certification
 SDG 17: Partnership for goals	Strengthening the means of implementation and renewing the global partnership for sustainable development	• Membership in the International Federations FIATA² and BIFA³ • Membership in IATA⁴ • Industrial partnerships

2 International Federation of Freight Forwarders Associations
3 British International Freight Association
4 International Air Transport Association

1.4 Stakeholders and engagement methods

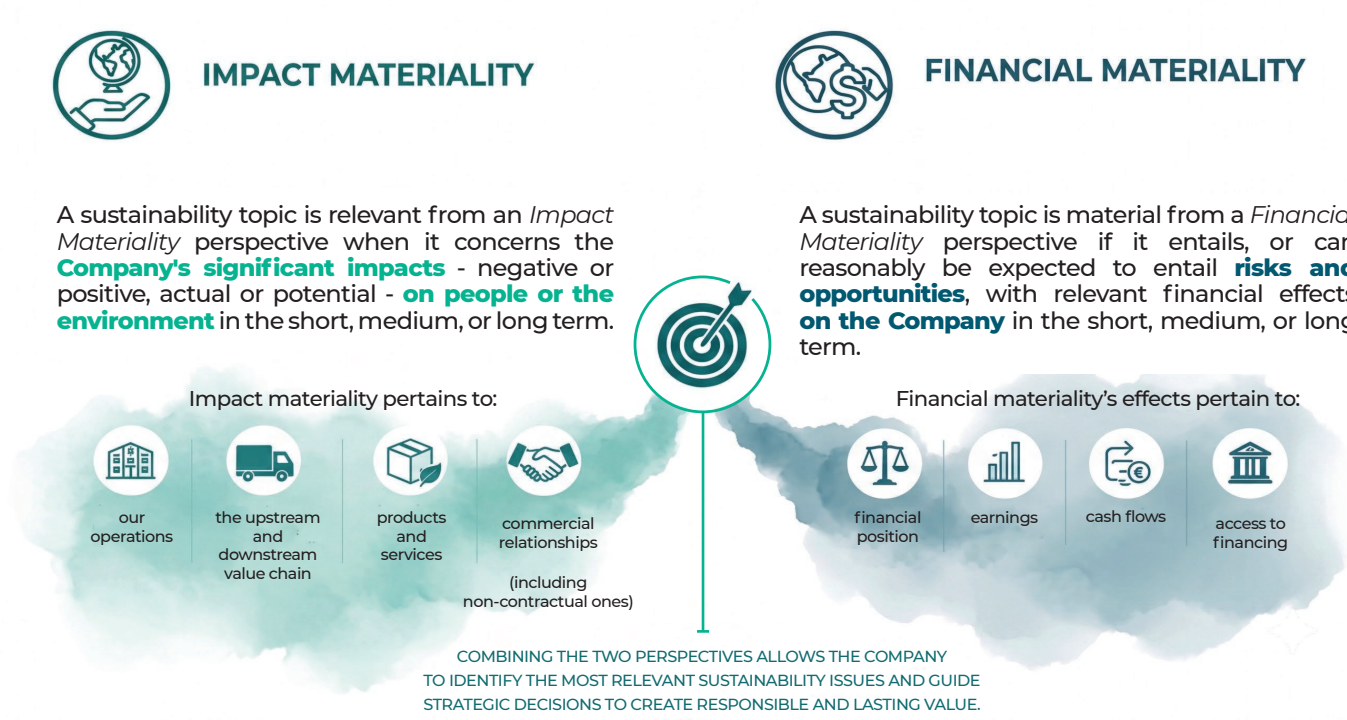
ISS Palumbo considers stakeholder engagement a useful tool for gathering perspectives, needs, and expectations regarding its activities. The information gathered through various communication channels helps **support the analysis of risks and opportunities and guides corporate decisions**.

The Company promotes engagement with its stakeholders through differentiated dialogue methods tailored to the different stakeholder categories, fostering an increasingly structured approach to relationship management.

STAKEHOLDER CATEGORY	MAIN DIALOGUE TOOLS	ENGAGEMENT OBJECTIVES
Human Resources - Management - Direct employees - Indirect staff - External collaborators	- Constant dialogue with the Human Resources function - Informal and institutional meetings - Training courses - Company intranet	- Report on company performance - Support engagement and active participation in company life - Spread a culture based on shared corporate values - Train people - Promote personal and professional growth - Improve the quality and satisfaction of the services provided
Customers	- Customer satisfaction surveys - Traditional communication channels (call centers, email) - Trade fair events	- Ensure the best level of service - Support dialogue and relationships
Suppliers of goods and services	- Audits and controls on services and contracts - Business meetings and discussions - Project partnerships	- Define and share objectives aimed at a sustainable supply chain - Share values and best practices
Public institutions and public supervisory authorities	- Institutional meetings - Production of transparent data and documentation	- Ensure timely and accurate compliance with regulatory obligations or any requests. - Establish transparent and collaborative relationships with authorities.
Shareholders and financial community	- Periodic meetings - Scheduled briefings	- Report on business performance - Notify strategic activities and ordinary and extraordinary transactions
Local area and community	- Website - Social networks	- Integrate the company's operations within the local area - Establish transparent and collaborative relationships with the community

1.5 Double materiality analysis

ISS Palumbo identifies sustainability topics on which to focus reporting based on the **principle of double materiality**, identifying and assessing both the impacts that corporate activities can generate on the environment and people (so-called **"Impact Materiality"**), and the implications related to a more or less effective management of ESG aspects on the company's resilience and business continuity (**"Financial Materiality"**). A sustainability topic is material if it is a priority from the perspective of Impact Materiality, Financial Materiality, or both.



In the previous financial year, the Company conducted a double materiality analysis for the first time, integrating, in addition to the impact perspective, a **financial materiality assessment**, in line with the approach established by the European Sustainability Reporting Standards (ESRS) and by the applicable EFRAG guidelines.

The assessment was conducted using a structured approach based on the analysis of the company's context, business model, and key ESG topics relevant to the reference sector, considering risks and opportunities potentially associated with the Company's activities.

During 2025, ISS Palumbo reviewed the validity of the analysis conducted in light of the evolution of the company's context, business model, and key ESG risk and opportunity factors. This review substantially confirmed the results of the previous assessment, highlighting no significant changes with respect to the topics identified as material.

Therefore, the scope of the ESG topics covered by the report remains confirmed: of the **27 sustainability topics** analyzed in the previous assessment, **19 were deemed material** and serve as the basis for the information reported in this Sustainability Report.

Appendix A, at the end of the document, contains a table containing, for each material issue, the impacts (positive and negative), risks, and opportunities that made the topic material.



1.6 Economic performance

The analysis of the economic value generated and distributed, carried out by reclassifying certain income statement items, highlights the Group's ability to generate value and distribute it to its main stakeholders.

In 2025, the economic value generated amounted to **€ 88.4 million**. The majority of this value was distributed to various stakeholders, including employees, suppliers, financiers, and the Public Administration, in compliance with the principles of economic and financial balance.

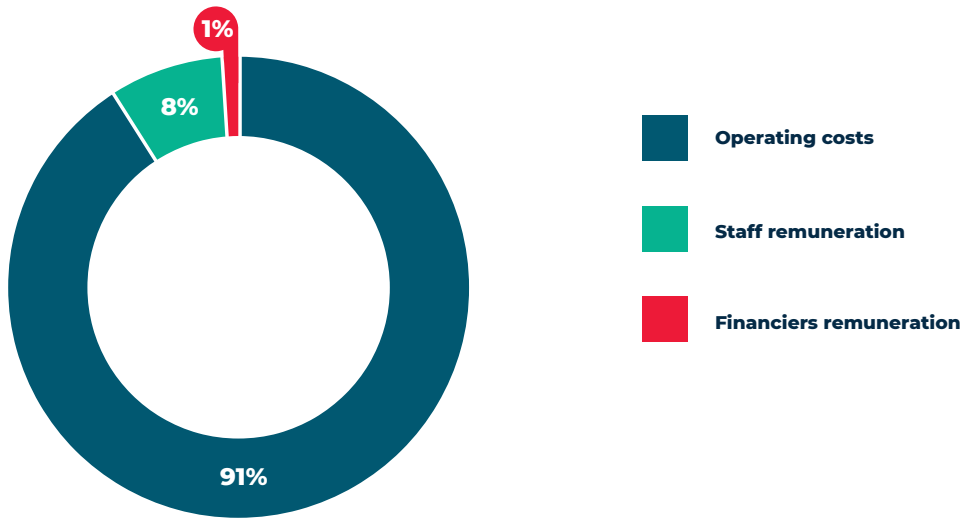
The following shows the composition of the economic value generated and distributed in the two-year period 2024-2025.

ADDED VALUE €	2024	2025
Revenue	75,830,766	88,131,917
Financial income	1,547,685	261,324
TOTAL ECONOMIC VALUE GENERATED	77,378,451	88,393,241
Operational costs	66,045,165	80,522,720
Staff remuneration	4,210,494	6,907,702
Financiers remuneration	1,538,766	1,327,552
Public Administration remuneration	1,426,890	129,280
TOTAL ECONOMIC VALUE DISTRIBUTED	73,221,315	88,887,254
Depreciation, write-downs and adjustments	2,109,866	2,888,959
Risk provisions and other provisions	2,800,318	20,000
Operating result allocated to reserves	(753,048)	-3,402,972
ECONOMIC VALUE RETAINED	4,157,136	-494,013

Revenues in 2025 amount to **€ 88.1 million**, down 18.7% from € 108.4 million in 2024. The decline is attributable to the Italian parent company, as well as its subsidiaries in the Middle East, Mozambique, and Turkey, where operations have been suspended or significantly reduced as part of an adopted savings plan.

Below is a representation of the allotment of the **economic value distributed** in 2025.

Destination of economic value distributed in 2025 (%)



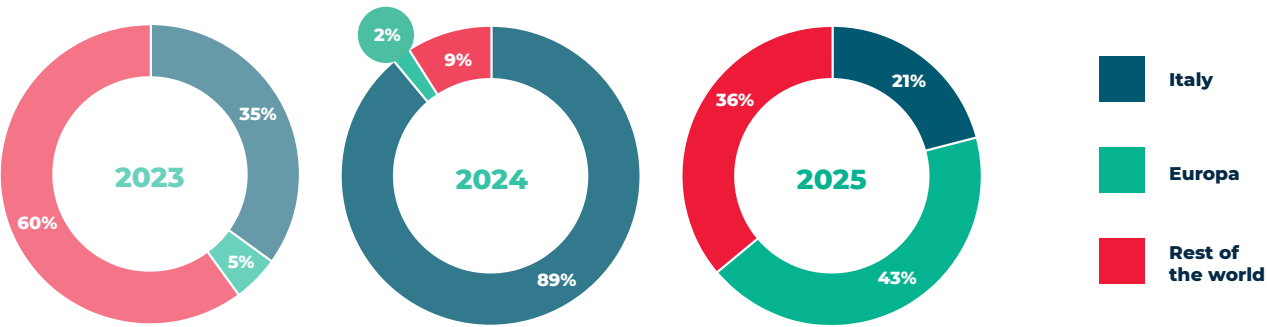
In 2025, the **economic value distributed** reached approximately **€ 88.9 million**, a value that slightly exceeds (approximately 100.6%) the economic value generated. The latter, in addition to covering operating costs incurred during the year, is used to remunerate the socioeconomic system with which ISS Palumbo interacts, including staff, financiers, and the public administration.

The remaining portion, or the **economic value retained**, was negative in 2025 at approximately -€ 0.5 million. This figure, calculated as the difference between the economic value generated and the distributed value and corresponding to approximately -0.6%, reflects the balance between depreciation, amortization, write-downs, and adjustments (€ 2.9 million), provisions for risks (€ 20,000), and the operating result allocated to reserves (-€ 3.4 million).

Regarding revenues generated in the three-year period 2023-2025, the following table shows the amounts broken down by geographic area. In 2024, a significant portion of revenues was generated abroad, accounting for approximately 90% of total revenues; in 2025, the geographic mix changed significantly, with Europe becoming the dominant region (43.4% of revenues, equal to € 38.1 million), followed by Italy (35.6%, equal to € 31.3 million), and the rest of the world, which decreased to 21.0% (€ 18.5 million).

REVENUES BY GEOGRAPHIC AREA	2023	2024	2025
Italy	56,122,017	6,486,802	31,284,418
Europe	4,862,620	1,455,460	38,109,349
Rest of the world	33,237,763	67,707,887	18,476,458
TOTAL	94,222,400	75,650,149	87,870,225

Revenues by geographic area 2023-2025 (%)



In 2025, total revenues rose to approximately **€ 87.9 million**, up 16.2% compared to 2024 (€ 75.7 million), though still below the 2023 level (€ 94.2 million). The geographic composition has rebalanced compared to 2024: the Italian share increased from 8.6% to 35.6%, the European share from 1.9% to 43.4%, while the rest of the world's share decreased from 89.5% to 21.0%.





ENVIRONMENTAL INFORMATION

2.1 Climate change

ISS Palumbo continues to strengthen its approach to managing environmental impacts through tools and initiatives aimed at improving performance and reducing emissions. Although the Company does not yet have a formal climate policy, it operates through an **ISO 14001:2015-certified Environmental Management System**, which supports the monitoring of relevant environmental aspects and the identification of improvement actions.

In 2025, the focus on decarbonizing the supply chain continued, through a more structured supplier mapping and monitoring the use of lower environmental impact solutions. Furthermore, the **“Carbon Care”** platform, which allows for estimating and monitoring CO₂ emissions associated with transport operations, according to a methodology compliant with ISO 14083:2023, continued to be integrated into the operational management system.

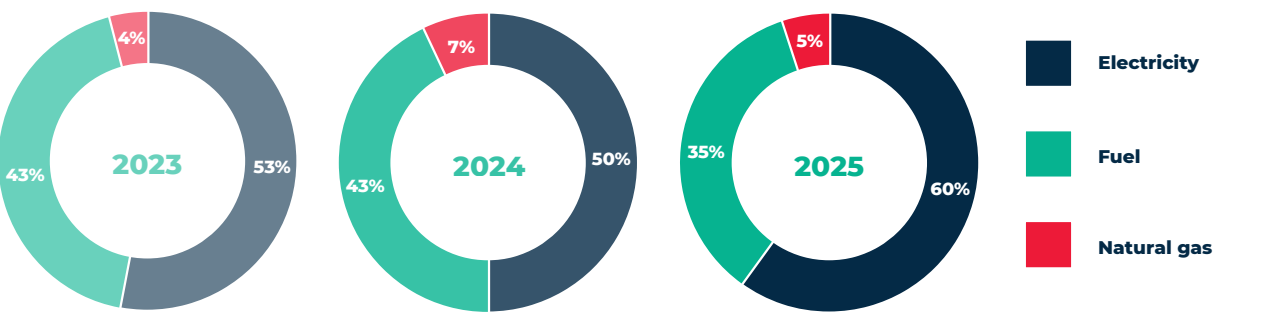
Periodic environmental risk assessments complement the management system adopted by the Company, facilitating the identification of areas for improvement and strengthening the resilience of business processes.

2.1.1 Energy consumption

ISS Palumbo pursues efficient energy resource management through monitoring its consumption. Specifically, the table below provides an overview of ISS Palumbo’s energy consumption.

ENERGY CONSUMPTION AND ENERGY MIX ⁵	2023	2024	2025
STATIONARY COMBUSTION (in MWh) ⁶	30	50	42
Natural gas	30	50	42
MOBILE COMBUSTION (in MWh)	323	321	279
Diesel	319	312	248
Gasoline	4	9	31
PURCHASED ELECTRICITY CONSUMPTION (in MWh)	393	384	477
Electricity purchased from national mix ⁷	393	384	477
TOTAL FOSSIL FUELS (in MWh)	746	755	798
Share of fossil fuels in total energy consumption (%)	100%	100%	100%
CONSUMPTION OF SELF-PRODUCED RENEWABLE ENERGY (in MWh)	-	-	-
Share of renewable sources in total energy consumption (%)	-	-	-
TOTAL ENERGY CONSUMPTION (in MWh)	746	755	798

Composizione del mix energetico (%)



In 2025, energy consumption amounted to **798 MWh**, an increase compared to 2024, primarily due to the increase in electricity consumption. ISS Palumbo’s energy mix consists of natural gas, automotive fuels, and electricity purchased from the national grid.

Specifically, **stationary combustion** decreased in 2025 (-16%), while remaining at higher levels compared to 2023.

Consumption related to **mobile combustion** has progressively decreased, from 321 MWh in 2024 to 279 MWh in 2025 (-13%). This trend is primarily attributable to the reduction in diesel consumption, only partially offset by the increase in gasoline.

Purchased electricity, which represents a significant share of the energy mix, decreased slightly in 2024 (-2%) and subsequently increased in 2025 (+24%).

Overall, energy consumption trends reflect the operational variability of company activities.

ISS Palumbo operates in sectors with a high climate impact⁸. Therefore, the following information is provided regarding the energy intensity associated with operations in these sectors, calculated as consumption in MWh per million euros of net revenue:

INTENSITY OF ENERGY CONSUMPTION	2023	2024	2025
Total energy consumption from operations in sectors with a high climate impact (MWh)	746	755	798
Net revenue from operations in sectors with a high climate impact (€)	94,618,008	75,830,766	47,300,331
ENERGY INTENSITY (MWH/M€)	7.9	10.0	16.9

2.1.2 Scope 1 and 2 GHG emissions

Greenhouse gases emissions (GHG) related to the company's activities can be divided into direct and indirect ones.

5 The energy consumption data refers exclusively to the Group’s Italian offices, excluding Palumbo Services S.r.l. The conversion factors used to calculate energy consumption refer to DEFRA (UK Department for Environment Food & Rural Affairs).
6 ISS Palumbo has no consumption of fuel from coal and coal products, nor consumption from nuclear sources.
7 That is, for which there are no Guarantees of Origin, contractual information or a specific emission factor.

8 Sectors with a high climate impact are those listed in Annex I, Sections A to H and L, of Regulation (EC) No 1893/2006 of the European Parliament and of the Council (as defined in Commission Delegated Regulation (EU) 2022/1288). This regulation defines the statistical classification of economic activities according to NACE Revision 2.



Scope 1 and Scope 2 emissions

Direct (**Scope 1**) emissions arise from the direct combustion of fossil fuels for electricity and heat generation, for fueling transport vehicles, or from the dispersion of fluorinated gases used for refrigeration and air conditioning. In the case of ISS Palumbo, these emissions are primarily produced by stationary and mobile combustion, i.e., the fuels of the company fleet.

Indirect (**Scope 2**) emissions, on the other hand, refer to the energy purchased and consumed by the company, mostly for the lighting and cooling of company facilities

GHG EMISSIONS AND GHG INTENSITY ⁹ COMPARED TO NET REVENUES	2023	2024	2025
Gross GHG Scope 1 emissions (tCO ₂ eq)	88	91	80
Gross GHG Scope 2 emissions – Location Based (tCO ₂ eq)	101	99	133
Gross GHG Scope 2 emissions – Market Based (tCO ₂ eq)	197	170	238
Total GHG Scope 1 and Scope 2 Location Based emissions (tCO₂eq)	189	190	213
Intensity of GHG Location Based emissions (tCO₂eq/M€)	2,0	2,5	4,5
Total GHG Scope 1 and Scope 2 Market Based emissions (tCO₂eq)	285	261	318
Intensity of GHG Market Based emissions (tCO₂eq/M€)	3,0	3,5	6,7

Over the three-year period 2023-2025, ISS Palumbo's greenhouse gas emissions show a trend generally consistent with the evolution of energy consumption.

Scope 1 emissions, related to the direct combustion of fossil fuels, were essentially stable between 2023 and 2024 (+3%), then decreased in 2025 (-12%).

Scope 2 Location-Based emissions remained stable between 2023 and 2024 (-2%), subsequently increasing in 2025 (+34%).

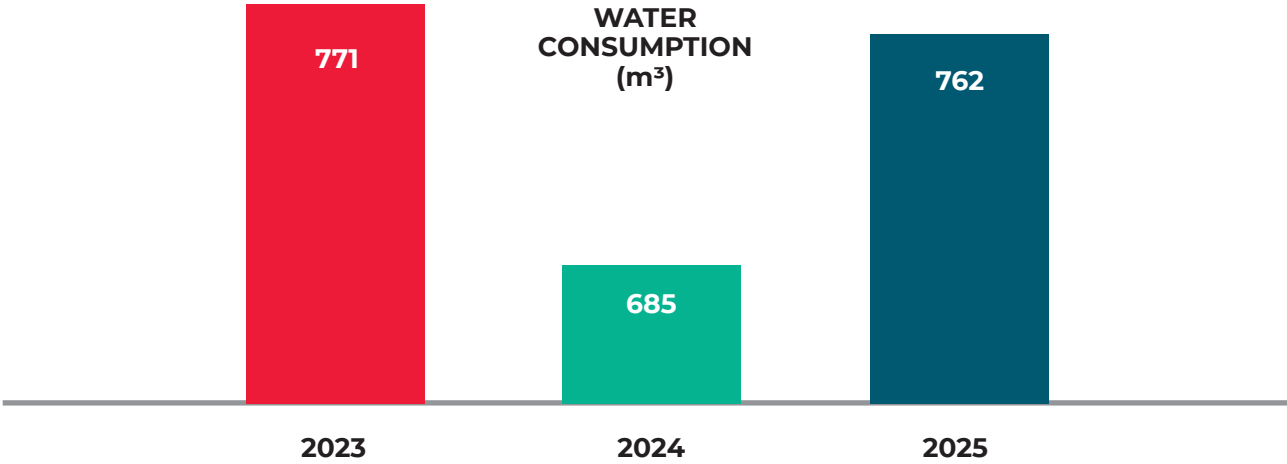
Similarly, **Market-Based Scope 2** emissions show a decrease in 2024 (-14%) and a subsequent increase in 2025 (+40%).

Overall, total Scope 1 and Scope 2 (Location-Based) emissions show a stable trend between 2023 and 2024 (+1%) and an increase in 2025 (+12%). Emissions calculated using the Market-Based approach, however, show a decrease in 2024 (-8%) followed by an increase in 2025 (+22%).

9 The emission factors used to calculate Scope 1 emissions are taken from the DEFRA (UK Department for Environment, Food & Rural Affairs) database for the respective years considered. The emission factors used to calculate Scope 2 emissions are taken from Report 404/2024 published by ISPRA for the Location-Based calculation method, and from the AIB European Residual Mixes for the respective years for the Market-Based calculation method.

2.2 Gestione della risorsa idrica

ISS Palumbo's water consumption comes almost exclusively from internal uses, related to the sanitation needs of its administrative offices. As there are no water-intensive industrial processes, water requirements are limited. Water is supplied exclusively through the public aqueduct network, which guarantees quality and safety. In 2025 the water consumption of ISS Palumbo¹⁰ amounted to a **762 m³**, showing an 11% increase compared to 2024. Wastewater is managed in accordance with current regulations and is used only for healthcare services.



10 I dati relativi ai consumi idrici si riferiscono al solo perimetro italiano (escludendo la Società Palumbo Services S.r.l.)

2.3 Responsible waste management

The waste generated by ISS Palumbo’s operations comes primarily from office activities and includes non-hazardous materials such as paper, plastic, and toner. Their treatment is outsourced to external suppliers, responsible for collection, recycling, and disposal. The company implements effective waste sorting and promotes internal awareness for greater environmental protection.

In 2025, further improvements in waste management were recorded: the total waste produced¹¹ amounted to **18.89 tons**, all of which was sent for recovery and therefore **not destined for disposal**. Specifically, the main waste streams consisted of mixed packaging (**16.50 tons**) and paper packaging (**2.12 tons**), along with smaller quantities of toner, non-hazardous end-of-life electronic equipment (CER 160214) and hazardous waste from electrical and electronic equipment (CER 160213).

Thanks to the recovery of all waste produced by 2025, the percentage of non-recycled waste is 0%, confirming the company’s commitment to a management model oriented towards circularity and minimizing environmental impacts.

WASTE AMOUNT (t)	2023		2024		2025	
	not destined for disposal	destined for disposal	not destined for disposal	destined for disposal	not destined for disposal	destined for disposal
NON-HAZARDOUS WASTE						
Paper packaging (CER 150101)	-	37.10	-	21.16	2.12	-
Mixed packaging (CER 150106)	-	6.36	-	39.17	16.50	-
Toner (CER 080318)	-	0.04	-	0.03	0.03	-
Plastic (CER 150102)	-	7.48	-	1.78	-	-
Iron and steel (CER 170405)	-	29.98	-	9.48	-	-
Other waste (CER 160214)	-	-	-	-	0.16	-
HAZARDOUS WASTE						
Hazardous waste (CER 160213)	-	-	-	-	0.09	-
TOTAL	-	80.96	-	71.62	18.89	-

11 The waste data reported refers only to the Italian perimeter (excluding the company Palumbo Services S.r.l.)



SOCIAL INFORMATION

3.1 Own workforce

In an increasingly complex and competitive market context, human and intellectual capital constitutes a significant strategic lever for ISS Palumbo.

In 2025, the Company consolidated its human resources management practices, **continuing the process of reviewing internal procedures and creating the employee manual, which provides a structured reference for all internal activities.** At the same time, **digital tools** for personnel management, including a system dedicated to monitoring attendance and a compensation system, continue to guarantee fairness and transparency in compensation processes.

ISS Palumbo confirms an inclusive and participatory approach in the management of workers and their representatives, encouraging constant dialogue through direct meetings and consultations, both with employees and through union representatives. The operational responsibility for ensuring effective worker participation is entrusted to the Human Resources Manager.

Furthermore, the Company adopts a structured approach to address and mitigate negative impacts on its workforce, ensuring effective remediation processes and **accessible communication channels** for employees. Workers can report concerns or needs through dedicated channels, including digital platforms, support desks, and meetings with company representatives, while respecting the principle of confidentiality. These tools also include the **Whistleblowing Platform** and, if necessary, third-party mechanisms for impartial support. The Company constantly promotes awareness and accessibility of these channels through training and awareness-raising initiatives. **Continuous monitoring** of reports allows us to evaluate the effectiveness of the strategies adopted and improve engagement, including through dialogue with stakeholders.

3.1.1 Company's staff

In 2025, ISS Palumbo had a total of **138 employees**, including both those employed in Italy and those at its foreign offices. Specifically, **83 employees** work in Italy and **55 abroad**. Approximately **75%** of the consolidated workforce is male (**104 men**), while the remaining **25%** is female (**34 women**). The predominance of men reflects the type of sector in which the Group operates, which has historically been characterized by a greater presence of men, although a growing female presence is noted, especially at its foreign offices.

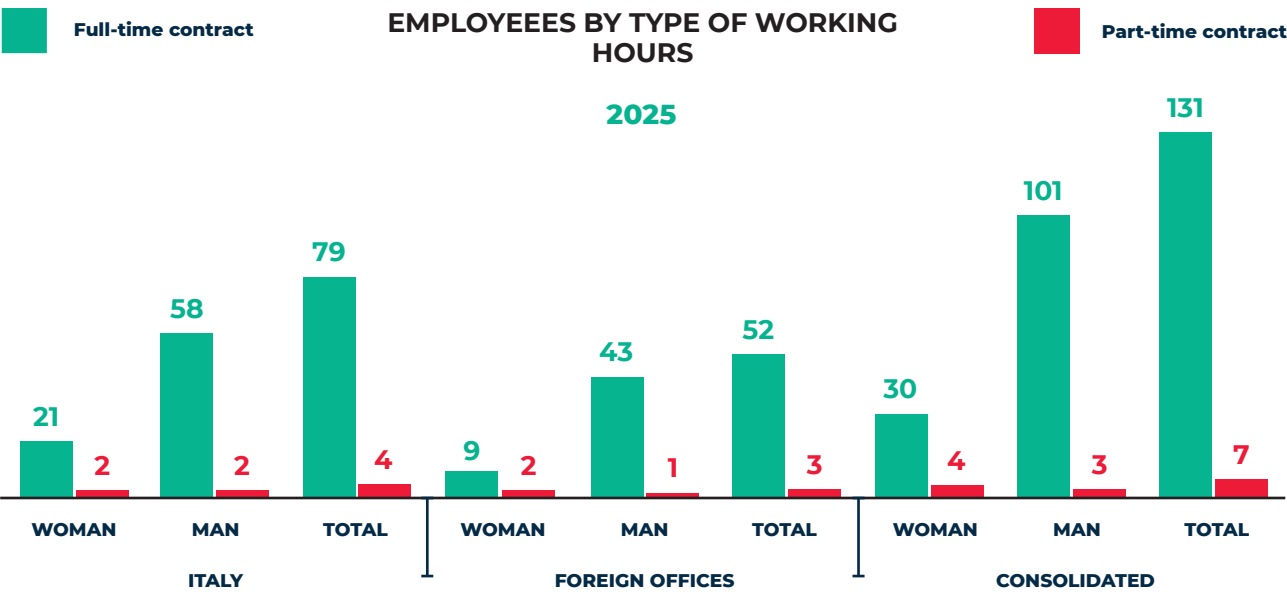
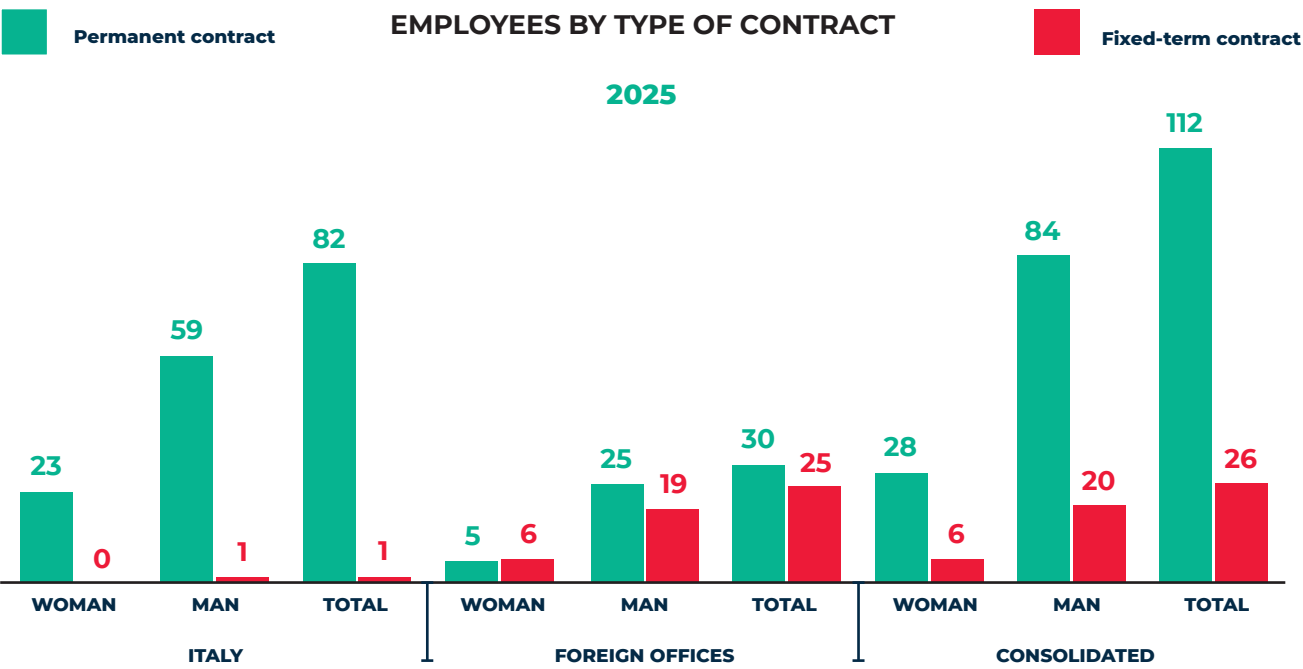
Almost all employees are hired on **permanent contracts**, equal to approximately **81%** of the total (**112 employees**), confirming the Group's commitment to stable, long-term employment relationships. Fixed-term contracts represent **19%** of the workforce (**26 employees**), with a higher incidence in foreign offices, where organizational and operational flexibility requirements related to local markets are more frequent.

Regarding working hours, **95%** of the Group's employees are employed on **full-time contracts (131 employees)**, while the remaining **5%** are employed on **part-time contracts (7 employees)**, a figure substantially in line with previous years. There are no contracts with variable hours.

EMPLOYEES BY TYPE OF CONTRACT AND GENDER	ITALY								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Permanent contract	15	47	63	15	47	62	23	59	82
Fixed-term contract	3	-	3	1	6	7	0	1	1
TOTAL	18	48	66	16	53	69	23	60	83
Full-time contract	17	47	64	14	51	65	21	58	79
Part-time contract	1	1	2	2	2	4	2	2	4
Variable hours contract	-	-	-	-	-	-	-	-	-
TOTAL	18	48	66	16	53	69	23	60	83

EMPLOYEES BY TYPE OF CONTRACT AND GENDER	FOREIGN OFFICES								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Permanent contract	7	41	48	7	38	45	5	25	30
Fixed-term contract	5	13	18	5	13	18	6	19	25
TOTAL	12	54	66	12	51	63	11	44	55
Full-time contract	11	54	65	11	51	62	9	43	52
Part-time contract	1	0	1	1	-	1	2	1	3
Variable hours contract	-	-	-	-	-	-	-	-	-
TOTAL	12	54	66	12	51	63	11	44	55

EMPLOYEES BY TYPE OF CONTRACT AND GENDER	CONSOLIDATED								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Permanent contract	22	89	111	22	85	107	28	84	112
Fixed-term contract	8	13	21	6	19	25	6	20	26
TOTAL	30	102	132	28	104	132	34	104	138
Full-time contract	28	101	79	25	102	127	30	101	131
Part-time contract	2	1	4	3	2	5	4	3	7
Variable hours contract	-	-	-	-	-	-	-	-	-
TOTAL	30	102	132	28	104	132	34	104	138



The following table provides detailed data on staff turnover, which is useful for monitoring employment dynamics within the Group.

In 2025, with reference to the Italian perimeter only, turnover remained at low levels and substantially in line with the greater stabilization trend already observed in 2024. In fact, there were **4 new hires and 5 terminations**, with a positive turnover rate of **5%** and a negative turnover rate of **6%**, confirming the substantial stability of the Italian workforce.

ITALY					
TURNOVER ¹²	No. employees	No. hires	No. terminations	Positive turnover rate	Negative turnover rate
2023	66	5	28	8%	42%
2024	69	10	7	14%	10%
2025	83	4	5	5%	6%

Regarding the foreign offices, the workforce has shown greater dynamism, with **16 new hires and 24 terminations**, corresponding to a positive turnover rate of **29%** and a negative turnover rate of **44%**, respectively. This trend is attributable to the expansion and strengthening of the Group's international presence. In particular, the opening of the new office in Romania contributed to the hiring of new resources, while the number of terminations is mainly attributable to the closure or progressive emptying of some foreign offices, where the activities and projects had been concluded.

FOREIGN OFFICES					
TURNOVER	No. employees	No. hires	No. terminations	Positive turnover rate	Negative turnover rate
2023	66	7	1	11%	2%
2024	63	5	8	8%	13%
2025	55	16	24	29%	44%

At the consolidated level, the Group recorded a total of **20 new hires and 29 terminations**, with a positive turnover rate of **14%** and a negative turnover rate of **21%**. The consolidated figure therefore highlights greater employee mobility compared to the Italian perimeter alone, influenced both by the foreign offices' organizational dynamics, and by the Group's international presence development process.

TURNOVER	No. employees	No. hires	No. terminations	Positive turnover rate	Negative turnover rate
2023	132	12	29	9%	22%
2024	132	15	15	11%	11%
2025	20	29	24	14%	21%

12 The 2025 turnover was calculated considering the new reporting scope, including the workforce of Palumbo Services S.r.l.; the changes compared to previous years are therefore also affected by the expanded scope.

The age distribution of employees continues to confirm a significant concentration in the **30-50 age group** in 2025, representing approximately **70%** of the Group's consolidated workforce (**97 out of 138 employees**). Those **over 50** represent approximately **21%** of the consolidated workforce (**29 employees**), while those **under 30** account for approximately **9%** (**12 employees**), remaining essentially in line with the incidence recorded in previous years.

Regarding **Italy** alone, the age distribution is essentially consistent with that recorded historically, with a predominance of the **30-50 age group (64%)**, followed by **those over 50 (28%)** and those **under 30 (8%)**. In **foreign offices**, however, a greater concentration is observed in the intermediate age group (**80%**), accompanied by a lower incidence of workers over 50 and under 30.

EMPLOYEES BY AGE GROUP	ITALY											
	2023				2024				2025			
	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total
TOTAL EMPLOYEES	5	44	17	66	6	46	17	69	7	53	23	83

EMPLOYEES BY AGE GROUP	FOREIGN OFFICES											
	2023				2024				2025			
	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total
TOTAL EMPLOYEES	10	50	6	66	7	50	6	63	5	44	6	55

EMPLOYEES BY AGE GROUP	CONSOLIDATED											
	2023				2024				2025			
	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total	< 30 years	30-50 years	> 50 years	Total
TOTAL EMPLOYEES	15	94	23	132	13	96	23	132	12	97	29	138

Regarding the composition of the workforce **by professional profile and gender**, **white-collar workers** remained the Group's largest category in **2025**, representing approximately **75%** of the consolidated workforce (**103 out of 138 employees**), followed by **blue-collar workers**, who make up approximately **15%** of the total (**21 employees**).

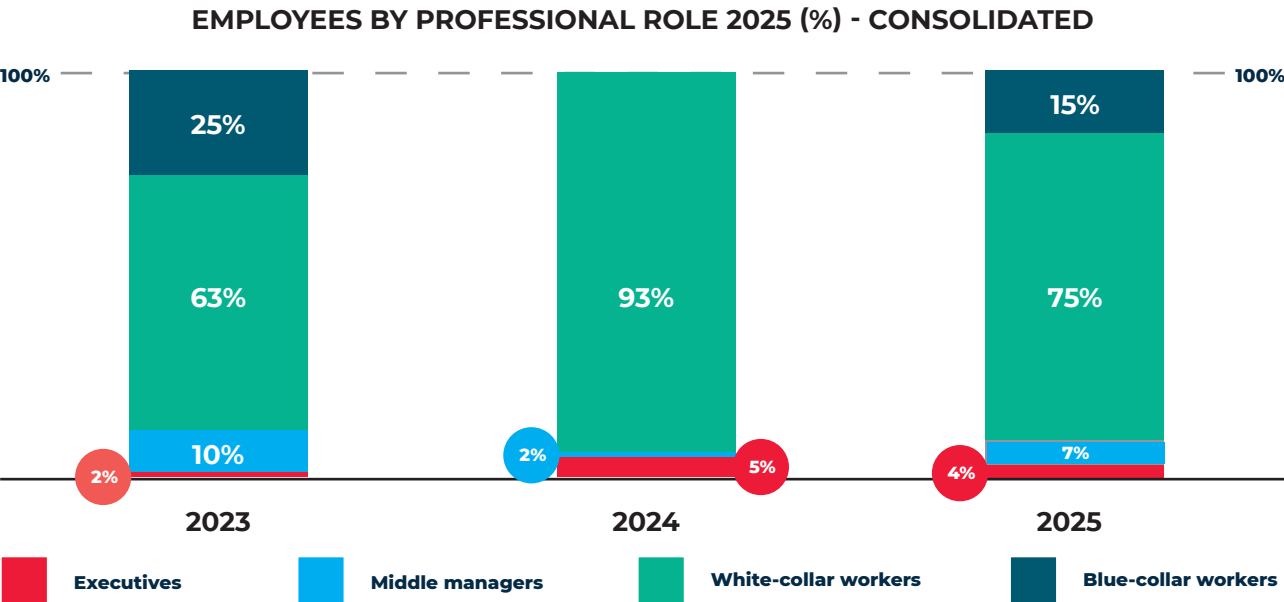
Regarding **Italy** alone, the workforce composition is essentially in line with previous years, with a predominance of **white-collar workers (63%)** and **blue-collar workers (25%)**, while **middle managers** and **executives** represent **10%** and **2%** of the total, respectively.

In **foreign offices**, however, a different organizational structure is observed, characterized by a clear predominance of **white-collar workers (93% of the foreign workforce)**, with a marginal presence of **middle managers** and **executives**, and the absence of personnel classified as **blue-collar workers**. This configuration reflects the predominantly commercial, administrative, or coordination nature of the activities carried out in the international offices.

EMPLOYEES BY PROFESSIONAL ROLE AND GENDER	ITALY								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Executives	-	2	2	-	2	2	-	2	2
Middle managers	1	5	6	1	5	6	2	6	8
White-collar workers	15	26	41	12	29	41	18	34	52
Blue-collar workers	2	15	17	3	17	20	3	18	21
TOTAL	18	48	66	16	53	69	23	60	83

EMPLOYEES BY PROFESSIONAL ROLE AND GENDER	FOREIGN OFFICES								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Executives	-	3	3	-	3	3	-	3	3
Middle managers	-	1	1	-	1	1	-	1	1
White-collar workers	12	50	62	12	47	59	11	40	51
Blue-collar workers	-	-	-	-	-	-	-	-	-
TOTAL	12	54	66	12	51	63	11	44	55

EMPLOYEES BY PROFESSIONAL ROLE AND GENDER	CONSOLIDATED								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Executives	-	5	5	-	5	5	-	5	5
Middle managers	1	6	7	1	6	7	2	7	9
White-collar workers	27	76	103	24	76	100	29	74	103
Blue-collar workers	2	15	17	3	17	20	3	18	21
TOTAL	30	102	132	28	104	132	34	104	138



At the collective bargaining level, all employees of the Italian offices are covered by the National Collective Labor Agreement (CCNL, according to the Italian acronym). Specifically, the following apply:

- CCNL for Logistics, Freight Transport, and Shipping;
- CCNL for Metalworkers and Industry.

In some cases, the workforce is supplemented with independent professionals. During 2025, independent workers will only concern Italy, with only one self-employed worker and one intern.



3.1.2 Diversity and equal opportunities

The Company continues its commitment to diversity and inclusion, promoting a fair work environment and valuing the talents of every individual. **The percentage of employees with disabilities increased slightly, confirming its focus on vulnerable groups.**

This section provides an overview of the composition of senior management and the distribution of employees with disabilities, broken down by gender. Through these data, the company reaffirms its commitment to equal opportunity, promoting an inclusive work environment and valuing the talents of every individual, regardless of their personal characteristics.

SENIOR MANAGEMENT BY GENDER	CONSOLIDATED								
	2023			2024			2025 ¹³		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Executives	-	2	2	-	2	2	-	5	5
Middle managers	1	5	6	1	5	6	2	6	8
TOTAL	1	7	8	1	7	8	2	11	13
PERCENTAGE	13%	87%	100%	13%	87%	100%	15%	85%	100%

The composition of senior management remains unchanged between the two financial years, with a total of 8 positions. In addition to the 5 male executives, senior management also includes 8 middle managers, with a predominantly male gender distribution (85%).

EMPLOYEES WITH DISABILITIES BY GENDER	ITALY								
	2023			2024			2025 ¹⁴		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
Total employees	18	48	66	16	53	69	23	60	83
Employees with disabilities	1	-	1	2	1	3	2	2	4
PERCENTAGE	6%	-	2%	13%	2%	4%	9%	3%	5%

The overall share of employees with disabilities in the total workforce stood at 5% in 2025. Specifically, women account for 9% of the total workforce, while men account for 3%.



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The data for the 2023 and 2024 financial years refer only to the Italian perimeter (excluding Palumbo Services S.r.l.), while the 2025 data include the entire Group, including foreign companies.

The data for the 2023 and 2024 financial years refer only to the Italian perimeter (excluding Palumbo Services S.r.l.), while the 2025 data also includes that company and its foreign offices. The latter do not include employees belonging to protected categories.

3.1.3 Training and skills development

In 2025, ISS Palumbo has confirmed its strategic commitment to training and professional development, recognizing the evolution of skills as a key driver for corporate competitiveness and resilience. The approach adopted is based on a **personalized and flexible training offering**, tailored to the different professional families, with the aim of ensuring maximum consistency between training programs and the operational needs of the various company areas.

In 2025, a total of 972 hours of training were provided, with an average of approximately 11 hours per employee, a decrease compared to 2024. The decrease is partly due to the conclusion, in January 2025, of the English language training project at the Livorno office, which represented a significant number of training hours; the project was subsequently restarted at the end of 2025, at the Milan and Reggio Calabria offices.

The **e-learning platform**, introduced in 2023 and progressively consolidated, represents a central tool in the training strategy. In 2025, its use was further extended to international offices, with content available in English, promoting greater standardization of courses across the Group. The offering includes mandatory modules—particularly on health and safety, cybersecurity, and ISO standards—along with specialized and cross-curricular content that can be accessed independently.

The training program features modular courses differentiated by role, with structured packages and regular refreshers for both new hires, as part of the onboarding process, and existing employees. Over the course of the year, content was enhanced with a focus on emerging topics, including artificial intelligence and cybersecurity, with the aim of strengthening widespread digital skills.

The offering of professional master’s degrees (10) continues, with a growing focus on innovation-related topics, including artificial intelligence and technical-specialist fields consistent with company roles.

Training activities are monitored through an automated reporting system, which allows for the analysis of participation and distribution of hours, including by geographical area, supporting increasingly targeted planning.

AVERAGE TRAINING HOURS	2023			2024		
	Woman	Man	Total	Woman	Man	Total
Executives	-	12	12	-	15	15
Middle managers	88	20	31	24	24	24
White-collar workers	24	36	32	42	25	30
Blue-collar workers	1	6	6	5	5	5
TOTAL	25	24	24	34	18	22

Executives	-	15	15	-	1,33	1,33	-	6,80	6,80
Middle managers	9,50	8,33	8,63	-	4	4	9,50	7,71	8,11
White-collar workers	10,44	16,06	14,12	0,36	0,53	0,49	6,62	7,66	7,37
Blue-collar workers	1,33	5,67	5,05	-	-	-	1,33	5,67	5,05

3.1.4 Health and safety at work

Health and safety on the workplace is a priority and ongoing commitment for ISS Palumbo and is fully integrated into the company’s management strategy and organizational culture.

In this context, the Company adopts an approach based on a structured system of controls, procedures, and activities aimed at ensuring compliance with current regulations, preventing accidents and occupational diseases, and promoting the overall well-being of workers in every operational context.

In 2025, the ISO 45001:2018-certified Occupational Health and Safety Management System (SGSSL, according to the Italian acronym) has been fully operational for Palumbo Srl, while Palumbo Services is not currently included in the certification scope, although a possible non-priority extension is being evaluated. The system guarantees 100% coverage of workers within the certified scope and is integrated with the Organizational, Management, and Control Model pursuant to Legislative Decree 231/2001, enabling a structured flow of information on HSE issues and continuous risk monitoring.

2025 also marked the first year of the post-certification renewal surveillance cycle, with a particular focus on the new logistics facility in Selvatelle (Pisa). The audits did not reveal any significant non-conformities, but they did allow for the identification of a continuous improvement plan.

The Risk Assessment Document (DVR, according to the Italian acronym) is being updated in 2025, with significant developments including the integration of climate change-related impacts. Specifically, the emergency plans for extreme weather events have been revised and the potential impacts on operational safety and business continuity assessed. This update is part of a broader process of progressive alignment with evolving ISO standards and emerging requests from key stakeholders.

In terms of regulatory compliance, the main regulatory updates were implemented in 2025, including Decree 159/2025 regarding the introduction of the digital badge, already implemented via the company app. In more complex operational contexts, such as construction sites, the transition from paper to digital systems has begun at the client’s request. Furthermore, monitoring of Legislative Decree 81/2008 and its interpretative updates remains constant, with particular attention to emerging issues related to organizational well-being and prevention.

Safety culture and training

In 2025, in line with the new State-Regions Agreement that came into force at the end of May (with a 12-month transition period), a process of reviewing and reorganizing mandatory health and safety training was initiated, with completion expected by May 2026. Specific training modules have been developed for employers and delegates, with a more practical approach and oriented to company operational contexts.

At the same time, the Company has strengthened its commitment to safety culture, with the aim of combating risk underestimation and strengthening widespread awareness. Initiatives underway and in development include periodic safety meetings with the RSPP, operational roundtables with delegated employers, and the sharing of best practices between the various operating sites, including specific logistics and warehouse contexts.

The Company regularly tracks key data relating to workplace accidents, allowing for effective monitoring of the measures adopted and, consequently, the prompt identification of any areas for improvement. Again in 2025, **no fatalities or injuries were recorded among employees**. Consequently, the injury rate¹⁵, calculated based on data from the accident register and the total hours worked during the year (equal to 241,077), is zero.



15 Ratio of the total number of recordable injuries to the number of hours worked, multiplied by 1,000,000 hours worked.

3.1.5 Corporate welfare and employee well-being

ISS Palumbo considers quality of work life a key factor in fostering employee engagement and stability. In 2025, the company confirmed its commitment to promoting a more flexible work environment that is attentive to individual needs, consolidating tools already implemented in previous years. Among these, **smart working has been confirmed** for office workers and VDT operators, with the option of working remotely one day a week. This approach has proven effective in ensuring business continuity while enhancing work-life balance.

In terms of welfare, the **digital platform** continued to be used in 2025, allowing employees to access special offers and discounts on goods and services.

This focus on well-being is also reflected in **parental protection**: in 2025, 14 employees took parental leave. Parental leave applies equally to both permanent and temporary employees, both full-time and part-time.

PARENTAL LEAVE	ITALY								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
No. employees	18	48	66	16	53	69	23	60	83
Employees eligible for parental leave	18	48	66	16	53	69	23	60	83
Percentage of employees eligible for parental leave	100%	100%	100%	100%	100%	100%	100%	100%	100%
Eligible employees who have taken parental leave for family reasons	2	4	6	5	1	6	6	1	7
Percentage of eligible employees who took parental leave	11%	8%	9%	31%	2%	9%	26%	2%	8%

PARENTAL LEAVE	FOREIGN COUNTRIES								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
No. employees	12	54	66	12	51	63	11	44	55
Employees eligible for parental leave	12	54	66	12	51	63	11	44	55
Percentage of employees eligible for parental leave	100%	100%	100%	100%	100%	100%	100%	100%	100%
Eligible employees who have taken parental leave for family reasons	6	-	6	7	1	8	5	2	7
Percentage of eligible employees who took parental leave	50%	0%	9%	58%	2%	13%	45%	5%	13%

PARENTAL LEAVE	CONSOLIDATED								
	2023			2024			2025		
	Woman	Man	Total	Woman	Man	Total	Woman	Man	Total
No. employees	30	102	132	28	104	132	34	104	138
Employees eligible for parental leave	30	102	132	28	104	132	34	104	138
Percentage of employees eligible for parental leave	100%	100%	100%	100%	100%	100%	100%	100%	100%
Eligible employees who have taken parental leave for family reasons	8	4	12	12	2	14	11	3	14
Percentage of eligible employees who took parental leave	27%	4%	9%	43%	2%	11%	32%	3%	10%

All employees are covered by Sanilog, the National Health Service's Supplementary Healthcare Fund for employees in the sector covered by the National Collective Bargaining Agreement (CCNL) for logistics, freight transport, and shipping, offering concrete support for workers' private healthcare expenditures. The Fund's objective is to ensure its members maximize the ratio between contractually stipulated contributions and the services provided, both in terms of quantity and quality. The healthcare services offered (diagnostic and checkup co-pay reimbursement, specialist visits, hospitalizations, maternity packages, physiotherapy treatments, dental care, etc.) are guaranteed by the following two insurance companies: Unisalute for general services and Aig-Odontonetwork for dental services. Employee enrollment in the Sanilog Fund is mandatory and automatic, paid through a monthly contribution paid by the Company. Specifically, this coverage applies to personnel covered by CCNL, namely Italy's National Collective Bargaining Agreement for Logistics, Freight Transport, and Shipping; personnel covered by the National Collective Bargaining Agreement for the Metalworking and Mechanical Industry are covered by the Metasalute Fund, which operates under similar terms and through the same insurance network (UniSalute). In foreign offices, where applicable, employees are also offered health insurance coverage to cover their various health needs.

3.2 Customer relationships

Most of ISS Palumbo's projects and services are activated through participation in **public tenders** launched by large market players. These calls require a high level of transparency, regulatory compliance and, increasingly, verifiable environmental, social and governance (ESG) performance. In 2025, the continuity of the operating model was confirmed, with an increasing level of structuring of the requirements requested by customers, particularly in the ESG area. These requirements include standard health, safety and quality packages, as well as specific requests on CO₂ emissions, regulatory compliance, anti-corruption and cybersecurity. In this context, joining qualification platforms such as Open-es allows the Company to guarantee traceability, continuous updating of data and alignment with customer expectations, also through the definition of improvement plans.

Efficiency and Control with the integrated QHSE System

Management of customer impacts and relationships is entrusted to a **QHSE Management System**, which integrates quality (ISO 9001:2015), health and safety (ISO 45001), and environment (ISO 14001), covering all company operations. Specifically, ISO 9001:2015 certification provides the framework for planning, implementing, monitoring, and improving processes, pursuing objectives of effectiveness, efficiency, and customer satisfaction. It allows for systematic monitoring of risks related to service quality, operational safety, and regulatory compliance, ensuring structured processes for **listening, traceability, prevention, and continuous improvement**. These processes include preventive analysis of customer needs, formalized complaint management, identification of operational issues, and timely implementation of corrective actions.

Direct customer engagement is ensured through **ongoing dialogue**, fostered by key figures such as the relevant Division Manager and project managers, who are responsible for establishing and maintaining strong **business relationships**. ISS Palumbo stands out for its ability to offer **integrated solutions** and high operational responsiveness, assuming a direct client interface role even in managing activities entrusted to partners and suppliers, ensuring coordination and overall responsibility for the service provided.

During 2025, the Company consolidated relationships with key clients and developed new projects, including international ones, strengthening its position in strategic areas such as the Middle East and laying the foundation for future expansion into new geographical areas. Operational partnerships with local players are key to effectively managing operations, particularly in contexts characterized by local content requirements and specific regulatory requirements.

Customer engagement is also supported by feedback collection and analysis tools and structured non-compliance management processes, which allow us to monitor service quality, identify any critical issues, and initiate corrective actions. In the event of operational issues, the Company ensures formal communication channels and timely and transparent management of reports, with the aim of preserving and strengthening the relationship of trust with the client.

An area of growing importance is data protection and **cybersecurity**. In 2025, there was an increase in customer requests regarding cybersecurity, with assessment questionnaires administered and requests for adequate data protection measures. ISS Palumbo has adopted a structured Data Protection model compliant with EU Regulation 2016/679 (GDPR), ensuring lawful, correct, and transparent data processing and ensuring high security standards throughout all business processes.

Overall, the relationship with customers is structured as an advanced partnership, based on transparency, reliability, and adaptability, in which ESG requirements play an increasingly important role both as a qualifying factor and as a lever for strengthening long-term relationships.

4

INFORMATION ON GOVERNANCE

4.1 Business conduct

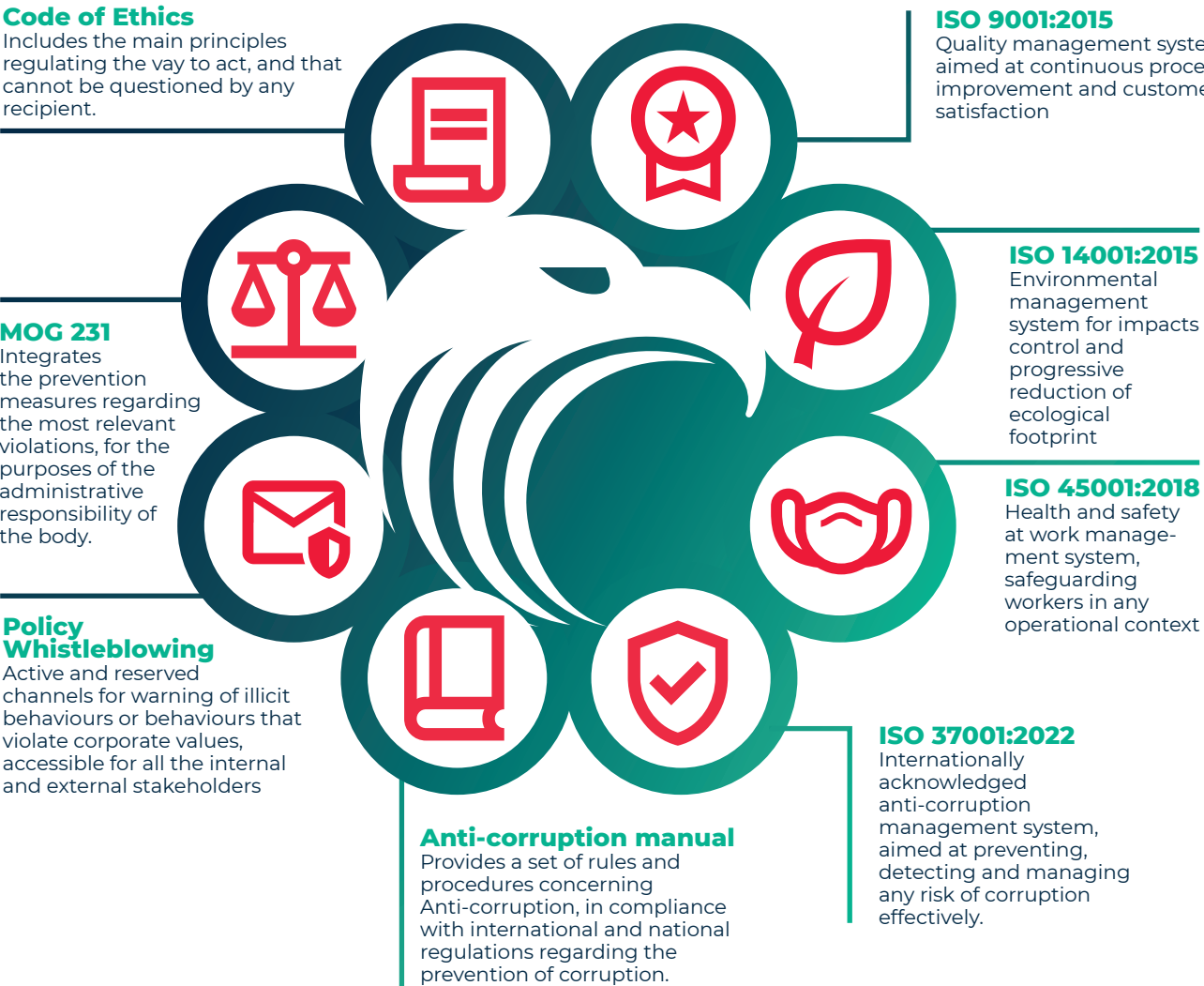
In 2025, ISS Palumbo further consolidated its corporate governance model, shifting it toward an integrated model of internal control, risk management, and ESG monitoring, consistent with the principles of the Code of Ethics, the applicable regulatory framework (including Legislative Decree 231/2001), and various market pressures.

The organizational model is part of a growing evolution in the European logistics sector, characterized by the progressive adoption of ESG reporting frameworks (ESRS/CSRD) and increased accountability along the entire value chain, where the supply chain is no longer an operational perimeter but a direct extension of the corporate governance system.

The corporate culture is based on the principles of:

- legality and integrity
- transparency and traceability of processes
- respect for human rights
- occupational safety
- environmental protection and progressive decarbonization

To support these principles, the company has adopted formalized policies, illustrated in the infographic.



Corporate culture **monitoring mechanisms** are also in place, through internal audits, reporting flow analysis, and periodic policy updates. These procedures enable the effectiveness of the measures adopted to be assessed and improved with a view to continuous improvement.

Following the adoption and maintenance of ISO 37001 certification, the following have been strengthened:

- conflict of interest controls
- segregation of duties
- traceability of operational and contractual decisions
- governance of third-party relationships

4.1.1 Prevention and detection of active and passive corruption

The anti-corruption system is based on **risk-based** thinking and the integrity of corporate behavior, promoting a **culture of transparency** throughout the value chain.

The **Anti-Corruption Manual**, applied to all Group companies and third parties, regulates:

- relationships with public administrations and strategic customers
- management of complex tenders and contracts
- gifts, sponsorships, and consultancy
- relationships with suppliers and supply chain partners

The control system includes:

- segregation of responsibilities
- periodic internal controls
- digital traceability of processes
- structured reporting management.

The **Supervisory Body**, responsible for monitoring the implementation of **Model 231** and the Anti-Corruption Manual, operates autonomously and has inspection powers and can rely on external support to ensure the independence and robustness of its controls. The findings of the audits and any corrective actions are periodically reported to the Board of Directors and Management.

A **whistleblowing system compliant with EU Directive 2019/1937** is in place, including anonymous reporting.

In order to strengthen internal culture, the company has launched an **anti-corruption training program**, which includes:

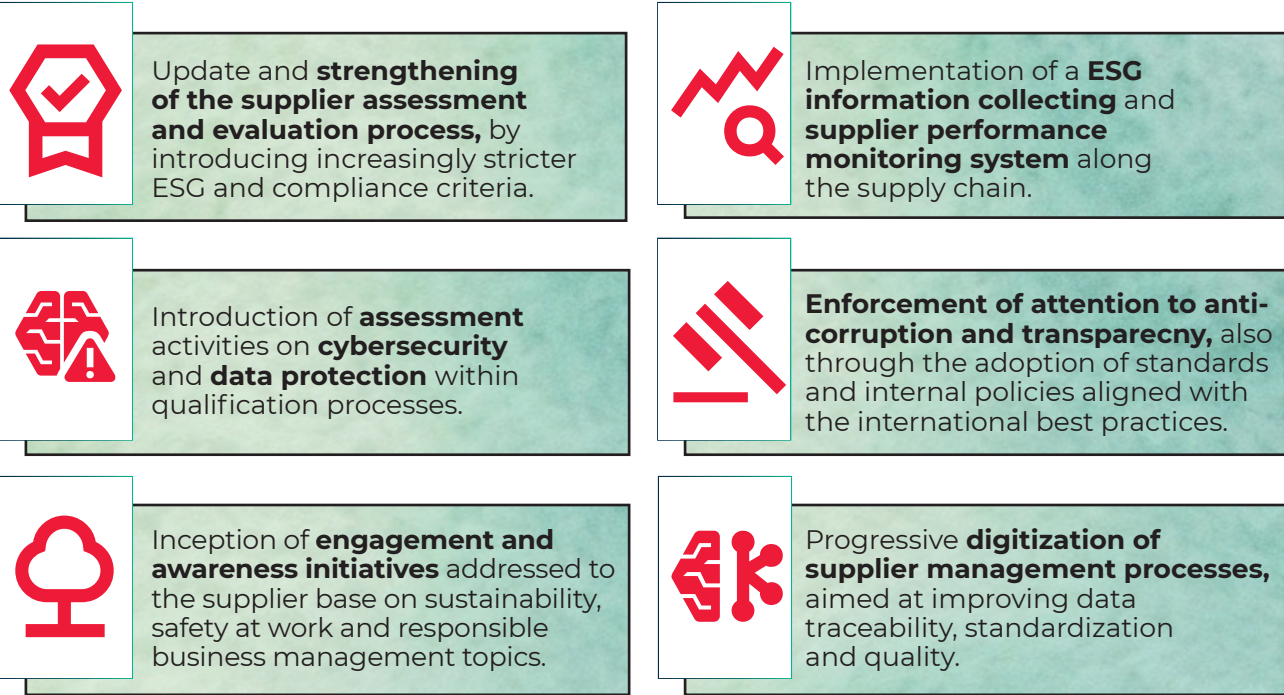
- **e-learning courses** for all staff;
- **in-depth modules** for at-risk roles;
- **classroom sessions** and updates for directors and top management.

4.2 Value chain management

Throughout 2025, value chain management continued to be influenced by a context characterized by growing geopolitical instability, evolving regulatory requirements, and increasingly high expectations from customers and stakeholders regarding sustainability, transparency, and risk management. International tensions, the growing focus on supply chain resilience, and the introduction of new reporting and due diligence obligations are pushing companies to strengthen their monitoring of their business partners and procurement processes.

In this scenario, issues such as respect for human rights along the supply chain, corruption prevention, cybersecurity, data protection, and monitoring of suppliers' environmental performance, with particular reference to indirect emissions (Scope 3), are becoming increasingly important. At the same time, the digitalization of supplier qualification and management processes requires an increasingly structured and data-driven approach.

In response to these developments, ISS Palumbo has strengthened its model of value chain management through the following main initiatives:



Through these initiatives, the Company intends to strengthen the resilience of its value chain and ensure greater alignment with regulatory requirements, emerging geopolitical risks and the expectations of key stakeholders.

4.2.1 Supply chain management

ISS Palumbo manages a network of highly qualified suppliers, with whom it maintains **structured, long-term relationships**, which are essential to ensuring operational continuity and service quality.

Most of the suppliers are long-standing partners, while new entrants are selected through a **qualification process** that considers various objective criteria:

- service quality and reliability
- economic competitiveness
- operational reliability and organizational solidity

In 2025, the evolution of the supply chain management model was consolidated towards the full integration of ESG criteria, in response to increasingly structured customer requests. These requests are evident throughout the entire project lifecycle: from the tender and qualification phase—through dedicated portals and document requirements—to the execution phase, through the activation of **improvement plans** that systematically involve both the parent company and its subsidiaries.

In this context, ISS Palumbo takes on the role of **enabler and integrator** along the value chain, translating customer requirements into operational standards and gradually transferring them to suppliers. This approach strengthens supply chain alignment on key issues such as **human rights, health and safety, integrity, and environmental performance**, while promoting a structured path of continuous improvement.

The “Carbon Care” platform and the monitoring of environmental and climate impacts

On the environmental front, ISS Palumbo has adopted tools to monitor emissions associated with logistics activities.

The **Carbon Care** tool, integrated into company systems, allows for the calculation of CO₂ emissions and supports:

- reporting of Scope 1, 2, and 3 emissions
- responding to customer climate requests
- launching a process of progressively involving suppliers in measuring and reducing impacts

This approach is part of a growing focus on **supply chain decarbonization** and environmental data transparency.

Supply chain management

Supply chain management is supported by digital tools that enhance transparency, traceability, and monitoring capabilities.

Specifically, the SupplyHi platform allows you to:

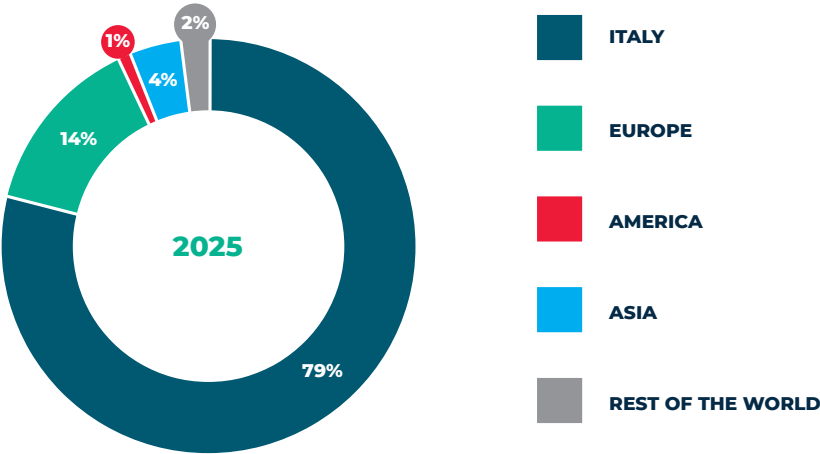
- centralize and standardize the **supplier qualification and evaluation process**
- collect information on **compliance, economic and financial aspects**, QHSE, and ESG
- define **evaluation criteria** differentiated by product category
- continuously **monitor supplier performance**

Through these tools, the Company strengthens its decision-making processes and enables **data-driven supply chain management**, in line with industry best practices.

In 2025, ISS Palumbo had **502 suppliers**, approximately **80% of which located in Italy**. The following table provides a breakdown of the company's suppliers' geographic distribution.

NUMBER OF SUPPLIERS BY GEOGRAPIC AREA	2023	2024	2025
Number of suppliers located in ITALY	298	514	398
Number of suppliers located in EUROPE	248	98	70
Number of suppliers located in AMERICA	11	16	7
Number of suppliers located in ASIA	41	21	19
Number of suppliers located in the REST OF THE WORLD	47	14	8
TOTAL SUPPLIERS	645	663	502

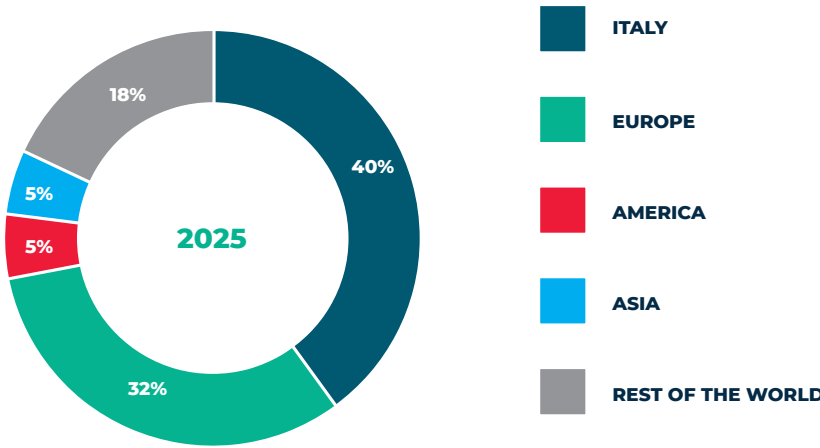
DISTRIBUTION OF SUPPLIERS BY GEOGRAPHIC AREA (2025)



In 2025, the share of spending on main suppliers will amount to approximately € 70 million. In Italy, spending has grown steadily over the three-year period, confirming the centrality of the national manufacturing sector to the company's operations. The increase in spending in Europe is particularly significant, reaching over € 31 million in 2024, despite the reduction in the number of suppliers. The following table details the share of spending by geographic area.

SPENDING SHARE ON MAIN SUPPLIERS BY GEOGRAPHIC AREA (€)	2023	2024	2025
Spending on suppliers located in ITALY	18,310,149	20,259,657	17,367,708
Spending on suppliers located in EUROPE	22,617,620	31,738,886	13,668,085
Spending on suppliers located in AMERICA	806,402	934,654	2,035,029
Spending on suppliers located in ASIA	20,534,587	14,244,190	2,145,614
Spending on suppliers located in the REST OF THE WORLD	19,674,323	3,148,412	7,695,278
TOTAL SUPPLIERS	81,943,081	70,325,799	42,911,714

SPENDING SHARE BY GEOGRAPHIC AREA (2025)



LIST OF RELEVANT ISSUES AND RELATED RELEVANT IROs					
TOPIC	RELEVANT ISSUE	RELEVANT IMPACTS		RELEVANT RISKS	RELEVANT OPPORTUNITIES
ESRS E1 – Climate change	Climate change adaptation			Extreme weather events (e.g., storms, floods, or heat waves) that can disrupt logistics operations, causing damage to infrastructure, delivery delays, and increased operating costs. Impact of new regulatory developments related to climate change on the range of services offered, resulting in high compliance costs.	
	Climate change mitigation	Contribution to air pollution due to lack of energy efficiency in offices.		Inadequate monitoring of GHG emissions, resulting in the inability to meet regulatory obligations (e.g., CSRD) and ESG stakeholder requests. Impact of new regulatory developments related to climate change on services offered.	Obtaining higher scores in tenders, for example by increasing the company's rating compared to the Open ES portal, thanks to collaboration with suppliers focused on reducing emissions. Development of services aimed at monitoring emissions to access new suppliers focused on sustainability.
	Energy	Reduction of emissions through the use of renewable energy sources.		Increased operating costs as a result of fluctuations in fossil fuel prices.	Use of renewable energy (self-produced or purchased with GO) and consequent reduction of energy dependence and the risk associated with price fluctuations.
					Use of lower-emission and more efficient energy sources, resulting in reduced energy consumption and related costs.
ESRS E5 – Economia circolare	Waste	Reducing material use through recovery and reuse.		Exposure to reputational damage and potential fines due to inadequate waste management.	
ESRS E5 - Circular Economy	Gender equality and equal pay for work of equal value				Enhancement of resources through Diversity & Inclusion policies that create a more equitable and attractive work environment and foster innovation.
	Training and skills development	Creating a work environment that allows the full expression of potential and talent.		Repercussions on company competitiveness due to employees with skills mismatched to their roles, resulting from delays in implementing adequate training.	Enhancement of employee skills through investments in technical and managerial training, resulting in increased productivity and greater employee loyalty.
		Providing opportunities for employees' professional development.			
		Failing to meet employees' expectations and needs for personal and professional growth.			
	Employment and inclusion of people with disabilities				Partnerships with organizations that support the employment of people in protected categories.
	Diversity			Endorsement of discriminatory and non-inclusive attitudes and practices, resulting in lawsuits and reputational damage.	
	Secure employment	Employment stability for company staff and opportunities for each employee to fully realize their potential.			Permanent employment policies and stabilization programs that increase job security and organizational resilience.
					Employee well-being through guaranteed employment security, with positive impacts on labor costs.
	Work-life balance	Protection of the psychological and physical well-being of employees and their families.		Endorsement of discriminatory and non-inclusive attitudes and practices, resulting in lawsuits and reputational damage.	Increased corporate attraction and retention and decreased absenteeism thanks to corporate policies and initiatives supporting corporate welfare.
		Promoting better employee-company relationships, in terms of corporate engagement.		Increased absenteeism resulting from employee dissatisfaction and work-related stress, with employees lacking adequate tools to achieve a work-life balance, resulting in negative impacts on workload management and operations.	
	Health and safety	Reduction in workplace accidents following the strengthening of control, prevention, and monitoring activities, as well as measures to manage near-misses implemented within the company.			Certified health and safety management system (e.g., ISO 45001) that reduces the risk of accidents, reducing the costs of injuries and occupational diseases.
	Other work-related rights (human rights protection)	Protection and promotion of fundamental human rights, excluding any form of discrimination, both within the company and in external relations.		Incidents of human rights violations attributable to the company and its entire supply chain, resulting in serious reputational damage and exposure to legal action.	Reduced exposure to fines and litigation and increased stakeholder trust thanks to guaranteed respect for human rights in employee relations.

LIST OF RELEVANT ISSUES AND RELATED RELEVANT IROs					
TOPIC	RELEVANT ISSUE	RELEVANT IMPACTS		RELEVANT RISKS	RELEVANT OPPORTUNITIES
ESRS S4 - Consumers and end-users	Access to (quality) information	Tailoring of services and availability of appropriate communication channels aimed at customers.		Ineffective sales strategy and stakeholder communications, and errors/omissions in marketing content that can lead to reputational damage, customer loss, and reduced revenue.	Clear and transparent communication of information to customers, resulting in fewer disputes.
				Failure to comply with regulations relating to responsible business practices (e.g., competition laws, contractual terms and conditions), resulting in fines or legal action.	
	Responsible business practices			Opaque or unfair business practices, resulting in reputational damage and loss of trust among business partners and financial institutions.	Adoption of responsible business practices and the subsequent development of long-term relationships with business partners who share the same ethical standards, creating a stable value chain.
				Risk of violating customs regulations, resulting in fines or shipment delays, due to access to incomplete information on national and international regulations.	
Other social topics	Privacy management and protection			Penalties and legal liability due to data loss and non-compliance with the NIS 2 Directive.	Reduced exposure to data breaches and hacker attacks.
				Damage to customer trust following personal data breaches.	Increased customer trust through the implementation of high data and information protection standards.
	Service quality and safety	Providing high-quality services for the benefit of customers.			
ESRS G1 – Business conduct	Corporate culture	Raising employee awareness of proper behaviour and developing a corporate culture of ethics, founded on the values of legality, fairness, and honesty.		ISS Palumbo's failure to promote a business approach based on ethical and sustainability principles, with negative impacts on its reputation and competitiveness.	Reduction of reputational and legal risks for major clients through the dissemination of ethical values through information and training initiatives and programs for all employees.
				Risk of sanctions for failure to comply with applicable laws and regulations.	Introduction of training courses and development programs for managers focused on corporate ethics, regulatory compliance, and transparent management, resulting in improved governance and stakeholder trust.
	Prevention and detection of active and passive corruption	Adoption of practices aimed at combating corruption (both active and passive) to protect ISS Palumbo's image from potential negative publicity and to ensure proper corporate conduct, in accordance with regulations and regulations.		Incidents of active and passive corruption due to the lack of policies and tools to combat this phenomenon, with the resulting risk of sanctions, legal liability, and reputational damage.	Adoption of anti-corruption systems and resulting reduction in exposure to sanctions and legal liability, enhancing the company's image, especially with major clients.
	Supplier relationship management	Ricadute derivanti dall'integrazione dei fattori ESG nella gestione della catena di fornitura			
		Verifica delle azioni e delle pratiche adottate dai propri fornitori, tramite il monitoraggio e la valutazione del loro allineamento ai temi ESG.			

DISCLOSURE REQUIREMENT	DESCRIPTION OF DISCLOSURE REQUIREMENTS	PARAGRAPH
ESRS 2 – GENERAL INFORMATION		
BP-1	General criteria for preparing sustainability statements	Methodological note
BP-2	Disclosures relating to specific circumstances	Methodological note
GOV-1	Role of the administrative, management, and supervisory bodies	2.1 Corporate organization
GOV-2	Information provided to the company's administrative, management, and supervisory bodies and the sustainability issues they address	2.1 Corporate organization
SBM-1	Strategy, business model, and value chain	2.2 Strategy and business model
SBM-2	Stakeholder interests and opinions	2.2 Strategy and business model
IRO-1	Description of processes for identifying and assessing significant impacts, risks, and opportunities related to resource use and the circular economy	2.3 Double materiality analysis
IRO-2	ESRS disclosure requirements covered by the company's sustainability statement	2.3 Double materiality analysis
MDR-P	Policies adopted to address significant sustainability issues	2.3 Double materiality analysis
		3. Environmental information
		4. Social information
		5. Information on governance
MDR-A	Actions and resources related to relevant sustainability issues	2.3 Double materiality analysis
		3. Environmental information
		4. Social information
		5. Information on governance
MDR-M	Metrics related to relevant sustainability issues	2.3 Double materiality analysis
		3. Environmental information
		4. Social information
		5. Information on governance
ESRS E1 – CLIMATE CHANGE		
IRO-1	Description of processes for identifying and assessing significant climate-related impacts, risks, and opportunities	2.3 Double materiality analysis
E1-2	Policies related to climate change mitigation and adaptation	3.1 Climate change
E1-3	Actions and resources related to climate change policies	3.1 Climate change
E1-5	Energy consumption and energy mix	3.1 Climate change
E1-6	Gross GHG emissions from Scope 1, 2, and 3 and total GHG emissions	3.1 Climate change

ESRS E5 USE OF RESOURCES AND CIRCULAR ECONOMY		
IRO-1	Description of processes for identifying and assessing significant impacts, risks, and opportunities related to resource use and the circular economy	2.3 Double materiality analysis
E5-2	Actions and resources related to resource use and the circular economy	3.3 Responsible waste management
E5-5	Resource outflows	3.3 Responsible waste management
ESRS S1 – OWN WORKFORCE		
SBM-2	Stakeholder interests and opinions	2.2 Strategy and business model
S1-1	Policies related to the company's own workforce	3.1 Own workforce
S1-2	Processes for engaging with its own workers and worker representatives regarding impacts	3.1 Own workforce
S1-3	Processes for remediating negative impacts and channels for its own workers to raise concerns	3.1 Own workforce
S1-6	Characteristics of the company's employees	3.1.1 Workforce
S1-7	Characteristics of non-employee workers in the company's own workforce	3.1.1 Workforce
S1-8	Collective bargaining coverage and social dialogue	3.1.1 Workforce
S1-9	Diversity metrics	3.1.2 Diversity and equal opportunities
S1-12	People with disabilities	3.1.2 Diversity and equal opportunities
S1-13	Training and skills development metrics	3.1.3 Training and skills development
S1-14	Health and safety metrics	3.1.4 Health and safety at work
S1-15	Work-life balance metrics	3.1.5 Corporate welfare and workers' well-being
S1-17	Incidents, complaints, and serious impacts in human rights matters	ISS Palumbo is committed to respecting and promoting human rights, as it is a key element in creating a respectful and inclusive work environment, essential for the well-being of employees and the long-term success of the entire organization. Therefore, should any incidents of discrimination be identified, they will be investigated and subject to disciplinary action. The Company declares that in 2024, there were no incidents or complaints of discrimination, nor any serious human rights incidents.
ESRS S4 – CONSUMERS AND END-USERS		
SBM-2	Stakeholder interests and opinions	2.2 Strategy and business model
S4-2	Processes for engaging consumers and end-users regarding impacts	3.2 Customer relationships
S4-3	Processes for remediating adverse impacts and channels for consumers and end-users to express concerns	3.2 Customer relationships

ENTITY SPECIFIC – PRIVACY POLICIY AND MANAGEMENT		
MDR-P	Policies adopted to address significant sustainability issues	3.2 Customer relationships
MDR-A	Actions and resources related to significant sustainability issues	3.2 Customer relationships
ENTITY SPECIFIC – QUALITY AND SAFETY OF SERVICES		
MDR-P	Policies adopted to address significant sustainability issues	3.2 Customer relationships
MDR-A	Actions and resources related to significant sustainability issues	3.2 Customer relationships
ESRS G1 – BUSINESS CONDUCT		
GOV-1	Role of the administrative, management and control bodies	4.1 Business conduct
IRO-1	Description of the processes for identifying and assessing the significant impacts, risks and opportunities associated with the company's conduct	2.3 Double materiality analysis
G1-1	Policies regarding corporate culture and business conduct	4.1 Business conduct
G1-2	Management of supplier relationships	4.2 Supplier relationships management
G1-3	Prevention and identification of active and passive corruption	4.1.1 Prevention and identification of active and passive corruption
G1-4	Confirmed cases of active or passive corruption	4.1.1 Prevention and identification of active and passive corruption

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