

POLICY - LU-VE S.p.A.

LU-VE S.p.A., a LU-VE Group company, is a leader in the design, construction and marketing of heat exchangers for air conditioning, refrigeration, and the cooling of industrial processes.

With the support of the Management, LU-VE S.p.A. shares and promotes the values expressed at Group level:



These are tangibly implemented in the Management Systems according to ISO 9001:2015, ISO 14001:2015, ISO 50001:2018, PED (2014/68/EU) standards, as well as in continuous compliance with applicable mandatory requirements in terms of product conformity.

LU-VE S.p.A. guarantees constant compliance with environmental legislation (Legislative Decree 152/06) and safety regulations (Legislative Decree 81/08) in force, as well as continuous updating on developments in the legislative and regulatory panorama.

LU-VE S.p.A. ensures constant compliance with the European GDPR Regulation No. 2016/679 regarding the processing of personal data and the protection of privacy, as well as the Administrative Liability of legal persons (Legislative Decree 231/01).

LU-VE S.p.A. also considers the following factors as essential and indispensable priorities in the context of pursuing its objectives:

1. **SAFETY:** LU-VE S.p.A. is committed to eliminating and/or reducing risks that impact the safety and health of workers, improving performance and outcomes related to health and safety at work issues, preventing accidents and occupational illnesses, and implementing appropriate measures to protect the Health and Safety in the Workplace of all employees, particularly by promoting a safety culture based on risk awareness, compliance with regulations, and a constant "safe behavior" approach.
2. **ENVIRONMENT:** LU-VE S.p.A is committed to reducing the environmental impact resulting from its activities, while maintaining the right balance between environmental, social, and economic responsibility. In particular, it strives to reduce waste, consumption, and optimize the use of natural resources and raw materials. LU-VE S.p.A is committed to evaluating in advance, with a focus on prevention and improvement, the environmental impacts of new installations and processes or modifications to existing ones, adopting feasible solutions that offer the best environmental performance, minimizing negative impacts on the environment, and promoting a sense of environmental responsibility at all levels of the organization.
3. **QUALITY:** LU-VE S.p.A. is committed to working continuously to improve product and process quality (particularly in product development and industrialization activities, production and delivery, as well as service and support), and to increase the benefits for all stakeholders (ownership, customers, employees, investors, suppliers, and the community). LU-VE S.p.A. is committed to enhancing operational efficiency through constant investment in processes and production facilities, waste reduction, and cost containment, leveraging partnership relationships with suppliers and exploiting all possible synergies (processes, products, suppliers).
4. **HUMAN CAPITAL:** LU-VE S.p.A is committed to enhancing the skills of the organization by promoting the development of human resources, motivating staff through the growth of professionalism, competence, and awareness. LU-VE S.p.A. is committed to investing in its employees as its main corporate asset, including investing in training and development, and promoting employee involvement, participation, and consultation for full sharing of the company's policies and objectives.
5. **CODE OF ETHICS:** LU-VE S.p.A is committed to ensuring equal opportunities and promoting constructive human and professional relationships. LU-VE S.p.A. is committed to ensuring respect for the Code of Ethics based on the fair recognition of achieved objectives, promoting human resources through the definition of a clear organization and role allocation, enhancing experiences and skills, providing continuous training and information, and conducting regular performance reviews.
6. **SOCIAL COMMITMENT:** LU-VE S.p.A. is committed to establishing and maintaining a dialogue, supported by a commitment to maximum collaboration, with local communities, representative bodies, corporate structures, and any other interested parties, both internal and external. This commitment is carried out through systematic reporting and periodic communication that is clear and transparent regarding the company's strategies and achievements in the areas of health and safety, environmental protection, in accordance with the provisions of the LU-VE Group's Code of Ethics. LU-VE S.p.A. concretely demonstrates its commitment to its employees by providing scholarships for the children of its employees and has integrated a Type A Social Cooperative into its operations, treating all members with the utmost respect and professionalism.
7. **CUSTOMER ORIENTATION:** LU-VE S.p.A is committed to satisfying the needs of its customers, with the aim of embodying market excellence and ensuring competitive positioning in all market segments, also

through continuous technological innovation of its products and differentiation of its offer. LU-VE SpA is committed to providing solutions and applications that drive both innovation and new business models in order to deliver and support customers during rapid market changes.

8. ENERGY: LU-VE S.p.A. is committed to pursuing energy savings, energy efficiency, and improving energy performance as fundamental objectives to enhance the company's competitiveness. LU-VE S.p.A. is committed to promoting awareness of the importance of efficient and proper use of energy resources, including seeking energy-saving solutions and optimizing consumption, while aiming for the best available technologies (BAT). LU-VE S.p.A. is committed to promoting and supporting the purchase of energy-efficient products and services and to disseminating and raising awareness among all personnel, according to their role and function, in order to empower and share the benefits of more efficient energy management.
9. SUSTAINABILITY: LU-VE S.p.A. commits, through the introduction of a dedicated Governance, to actively promote sustainability issues as a tool for change and opportunities for improvement across various processes. LU-VE S.p.A. commits to contribute to and follow the guidelines of all the Sustainable Development Goals indicated in the 2030 Agenda.
10. SUPPLY CHAIN: LU-VE S.p.A. is committed to establishing long-term mutually beneficial relationships with its main suppliers as "Partner Suppliers," with the aim of continuously improving competitiveness, reliability, and mutual trust, and contributing to maintaining a consistently high quality of the supplied products. In accordance with its "Code of Ethics," LU-VE S.p.A. requires all suppliers to fully and unconditionally comply with all national and international legislations, including conventions related to the protection of human rights. Finally, LU-VE S.p.A. promotes the selection of its suppliers based on criteria that respect the principles of environmental protection, health and safety of workers and individuals in general, and are oriented towards processes that also consider aspects of energy efficiency and consumption reduction.

Lastly, LU-VE S.p.A. is committed to respecting the founding values that remain the undisputed pillars of the Corporate leadership:



*Humility, to continue learning in order to keep growing.
Passion, for life and for one's work.
Mindset, always positive and always focused on the future.*

(Iginio Liberali)

This Policy is communicated to all LU-VE S.p.A. personnel and is available to all interested parties.

The Management



