

Responsible Governance and integrity

Ethical governance in line with current regulations is key to credible, sustainable development.

- **0**
Violations of the Code of Ethics within the Company or along its supply chain
- **0**
Incidents of corruption
- **100%**
Certifications maintained
- **0**
Fines or penalties for non-compliance
- **0**
Fines or penalties for non-payment
- **108 ore**
Specific training on sustainability for governance

7.1

Roles, responsibilities, and dedicated bodies

In 2024, Vivaldi & Cardino took a significant step forward in ESG governance by formally establishing an internal Sustainability Team with a strategic and operational role. The team is coordinated directly by the CEO and comprises the organization's top management, confirming the central importance of sustainability for the Management.

THE TEAM:

- Paolo Cardino – Chief Executive Officer
- Micaela Megliola – Head of Administration
- Antonello Previtali – Head of Safety, Environment, and Quality
- Paolo Di Risio – Head of Operations
- Stefano Cimenti – Head of Human Resources
- Leonardo Cestari – Head of Procurement

The ESG Team meets monthly to discuss, evaluate, and resolve on key environmental, social, and governance initiatives. Its activities include reviewing and validating ESG policies, strategic plans, reports, and projects, which are then submitted to the Board of Directors for formal approval.

The active participation of the CEO gives the Team strong legitimacy and ensures a direct link between corporate governance and sustainability strategy, facilitating the effective integration of ESG objectives into medium- to long-term business decisions.

To support its activities, the Team draws on the expertise of a consulting firm specializing in sustainable development and, in 2024, participated in a 108-hour training course focused on strategic sustainability management and the adoption of ESRS.

In 2025, to further strengthen this structure and ensure its full operational autonomy, the Company envisages establishing an internal Sustainable Development Office. A manager with specialist ESG expertise will be appointed, tasked with coordinating the Team, supporting methodological activities, and ensuring continuous alignment with national and international reporting standards and regulations.

This approach reflects the desire to integrate sustainability as an integral part of corporate management, recognizing it as an important element in responding responsibly to stakeholder expectations, contributing to the well-being of the territories in which the Company operates, and facing future challenges with positive determination.



7.2

ESG monitoring and reporting

Each objective introduced in the 2025-2030 strategic sustainability plan represents a concrete commitment for Vivaldi & Cardino. **For this reason, the implementation process is constantly monitored through reports prepared by the person in charge and shared with the internal sustainability team to verify progress and effectiveness of the actions underway.**

An annual review is also carried out to assess:

- The adequacy of the resources allocated, with the possibility of modify them if necessary;
- The implementation of corrective actions in case of deviations from targets;
- The consistency of the objective with the business context. When the new materiality analysis identifies an objective as no longer a priority, resources are reallocated to more strategic and relevant goals.

As evidence of its transparency and ongoing commitment, Vivaldi & Cardino voluntarily publishes its Sustainability Report every year, making it available in the "Company Documents" section of the Company website. The document, available for download by all stakeholders, is a useful tool for communicating progress made regarding ESG objectives and fostering open dialogue with interested parties.

The Company intends to maintain its voluntary commitment in the years to come, recognizing the publication of the sustainability document as a strategic lever for consolidating transparency, strengthening trust, and promoting a shared culture of sustainability.





7.3 ESG risk management

In a global context characterized by increasing complexity and instability, the ability to identify, assess, and manage ESG risks is an essential requirement for any organization that intends to operate in a responsible and forward-looking manner.

For this reason, Vivaldi & Cardino has embarked on a structured process aimed at integrating environmental, social, and governance risks into its corporate strategy. The process, currently under development, will be completed by 2025 and will run in parallel with the implementation of IRO (Impact, Risk, and Opportunity) analysis, in line with the ESRS approach.

The goal is to build an ESG risk management system that allows the organization to anticipate critical scenarios, assess exposure to potential negative impacts, and seize opportunities related to sustainable transition. This approach will help strengthen the resilience of the business model and guide corporate decisions toward a long-term perspective based on awareness and the creation of shared value.