

SUSTAINABLE PROCUREMENT POLICY

Document	Version	Issue date	Approved by
Sustainable Procurement Policy	1.0	26/06/2026	Thomaz Zobeles

1. INTRODUCTION AND STRATEGIC CONTEXT

The supply chain represents a fundamental strategic lever for Everel Group: from plastic and metal materials to electronic components, from logistics services to packaging materials, purchasing choices have a direct and significant impact on the environment, people and communities throughout the entire value chain.

Everel recognizes that the sustainability of its supply chain is a strategic imperative and not merely a regulatory requirement. The double materiality assessment conducted in 2025 confirmed that the topics 'Supplier and supply chain relationships', 'Resource inflows' and 'Emissions/climate change mitigation' are among the areas of greatest financial and impact relevance for the Group.

This Sustainable Procurement Policy defines the principles, criteria and commitments that guide the procurement decisions of the Everel Group, integrating environmental, social and governance (ESG) considerations into the supplier selection, qualification and management process.

2. SCOPE OF APPLICATION

This policy applies to:

- All company functions that make purchases or manage supplier relationships (Purchasing, Quality, Operations, R&D, Supply Chain, Administration).
- All direct suppliers (Tier-1) of goods, materials and components to the Everel Group, regardless of country of origin.

The policy is integrated with the Environmental Specification (Doc. AQ10), the General Terms and Conditions of Purchase (Mod. SGP016) and the Code of Ethics of Everel Group S.p.A., which remain contractually binding reference documents.

3. GUIDING PRINCIPLES FOR SUSTAINABLE PROCUREMENT

Everel's sustainable procurement strategy is based on the following key themes, which identify the main ESG topics relevant to supplier relationships:

3.1 Environmental principles

- Preference for low-impact and recycled materials
- Compliance with European directives and other directives applicable in the target market
- Minimization of packaging and waste
- Ecodesign and product life cycle

3.2 Social principles

- Respect for human and labour rights (ILO)
- Safe and dignified working conditions
- Prohibition of child labour and forced labour
- Equal treatment and non-discrimination

3.3 Governance principles

- Ethical conduct and anti-bribery
- Transparency and traceability
- Conflict-Affected and High-Risk Area minerals
- Privacy and data security
- Supply chain resilience and continuity

4. SUPPLIER SELECTION AND QUALIFICATION CRITERIA

Everel Group adopts a structured approach to supplier selection and qualification, integrating economic and commercial criteria with ESG criteria. The assessment takes place before any commercial relationship begins and is updated periodically.

4.1 Mandatory qualification and assessment criteria

The following requirements are non-negotiable prerequisites for admission to the Everel supplier base:

- Acknowledgement of Everel's Sustainability Specification (AQ10) and the General Terms and Conditions of Purchase
- No sanctions or convictions for environmental offences, corruption or human rights violations in the previous 3 years (for supplies exceeding €50,000/year)
- Acknowledgement of the Code of Ethics of Everel Group S.p.A. and its Organizational Model

4.2 Preferential qualification and assessment criteria

When selecting and assessing qualified suppliers, Everel assigns an additional score to suppliers that can demonstrate "Sustainability Activities", including one or more of the following:

- ISO 14001 certification (Environmental Management System)
- ISO 45001 certification (Occupational Health and Safety Management System)
- Active sustainability rating (EcoVadis or other)
- Use of renewable energy in their production processes
- Active circular economy programmes (waste reduction, use of recycled materials, sustainable packaging)
- SA8000 certification or equivalent for social responsibility
- Presence of a Strategic Plan and/or Sustainability Report prepared according to recognized standards (GRI and/or ESRs/VSME)

5. SUPPLIER ESG ASSESSMENT

Everel adopts an ESG Questionnaire addressed to Suppliers to map, monitor and progressively improve environmental, social and governance performance along its supply chain. The tool is structured into thematic areas covering the main ESG risks: respect for human and labor rights, health and safety, environmental impacts, business integrity and regulatory compliance.

The Questionnaire is sent as a priority to strategic suppliers, with the aim of progressively extending its application to the entire supplier base. The responses collected are assessed according to predefined scoring criteria and contribute to the definition of an ESG risk profile and to the periodic supplier assessment (Vendor Rating).

5.1 Objectives and coverage targets

Objective / KPI	Baseline 2024	Target 2025	Target 2026	Owner
No. of strategic suppliers assessed / No. identified (>€20k purchasing turnover)	0/111 (2024)	33% (37 fornitori)	66% (74 fornitori)	Purchasing
Share of local supplier turnover / total	>50%	>50%	>50%	Purchasing

6. SUSTAINABLE DEVELOPMENT GOALS

In line with the Strategic Plan, Everel is committed to build a supply chain that is as transparent, fair and respectful of human and labour rights as possible, contributing to SDG 12 (Responsible consumption and production), SDG 8 (Decent work and economic growth) and SDG 17 (Partnerships for the goals).

7. SUPPLY CHAIN REGULATORY COMPLIANCE

Consistently with the Environmental Specification (AQ10), all suppliers of products to Everel Group S.p.A. must ensure compliance with applicable international environmental regulations. This policy strengthens and expands these requirements from an ESG perspective.

7.1 Product environmental requirements

- Compliance with the RoHS Directive (Dir. 2011/65/EU) and RoHS II (Dir. 2015/863/EU), and subsequent amendments, for all EEE
- Compliance with the REACH Regulation (Reg. 1907/2006/EC) — mandatory SCIP declaration for SVHC substances >0.1% w/w and applicable restrictions
- Absence of POP substances (Reg. 2019/1021/EU): PCB, PFOS, HBCDD, SCCP
- Absence of ozone-depleting substances (Reg. EC/1005/2009)
- Halogen and phosphorus content in homogeneous material: max 1.000 ppm (max 900 ppm for PCBs), where required and applicable
- Compliance with WEEE/RAEE obligations (Dir. 2012/19/EU) for end-of-life management

7.2 Packaging requirements

- Compliance with the Packaging Directive (Dir. 94/62/EC): total heavy metals (Cd, Hg, Cr VI, Pb) <0.01% and EU Regulation 2025/40 PPWR, and subsequent amendments
- Absence of DMF (Dimethyl fumarate) in packaging (Decision 2001/95/EC)
- Heat-treated wooden packaging certified according to ISPM No. 15
- Absence of MOSH and MOAH in packaging materials
- Preference for low environmental impact, recyclable or reusable packaging

7.3 Conflict minerals

- Everel declares that the minerals Tin, Tantalum, Tungsten and Gold (3TG), as well as other minerals relevant for extended due diligence, if present in its products, do not originate from conflict-affected or high-risk areas, as defined by Regulation (EU) 2017/821.
- Everel suppliers are required to declare the possible presence of minerals subject to origin monitoring and to complete CMRT and EMRT where applicable. Similarly, Everel provides CMRT and EMRT templates to its customers upon request.

8. GOVERNANCE AND RESPONSIBILITIES

The governance of sustainable procurement is integrated into the sustainability governance structure of the Everel Group, as defined in the Sustainability Strategic Plan.

Body / Function	Role in the policy
Management Committee	Approval of the policy, budgets and targets; internal/external communication
Operating Committee	KPI monitoring, action plan management, half-yearly report
Purchasing Function	Operational application of the policy, EcoVadis assessment, supplier qualification
Environment Quality System	Regulatory compliance verification, management of F100 and AQ10 specification, supplier audits
All employees involved in purchasing	Compliance with the principles of the policy in daily procurement decisions

9. REVIEW AND UPDATE

This sustainable procurement policy is:

- Updated and reviewed at least every three years by the Operating/Management Committee, or following significant regulatory, organizational or contextual changes.
- Formally approved by the Vice President & Sustainability Manager of Everel Group S.p.A.

Progress towards the targets is monitored annually, with reporting to the Management Committee.

10. COMMUNICATION, TRANSPARENCY AND STAKEHOLDERS

This policy is communicated to all employees through internal channels (company intranet) and published on the company website.


Place and date:

Valeggio sul Mincio, 26/06/2026

Approved by:

Thomaz Zobebe

Vice President & Sustainability Manager


(Signature)