Environment Protection Policy

Revision Matrix

SAFO UK Limited (company number 06478031)

Version: [2]. Prepared by: [Legal Department / A.C.T. London Limited]. Approved by: [Claudia Barbotto, Managing Director], [7th October 2026]. Policy owner: [Claudia Barbotto, Managing Director]. Next review: [October 2027]. Definitions: in this document, "the Company" means SAFO UK Limited. "SAFO GROUP S.p.A." is the Italian head company of the Group, and "the Group" or "SAFO Group" means SAFO GROUP S.p.A. together with the companies it controls and the Company. This document applies to the Company in the United Kingdom, its directors, employees and all persons acting on its behalf. References to the Group apply to other Group companies only to the extent of their activities in or connected with the United Kingdom.

Version	Date	Subject	Prepared by	Approved By
1.1	20.03.24	1st Issue	Legal Department	RD
2	17.07.2026	Review against UK legal requirements	A.C.T. London Limited / Legal Department	CB
2.1	07.10.26	Changed to Group Logo	Managing Director	CB

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1. Purpose

Ensure full compliance with applicable environmental protection legislation and regulations.

Limit the environmental impact[1] resulting directly and indirectly from the Group's activities.

2. Scope

All SAFO Group staff and all third parties who do business for or with the Group's companies are responsible for adhering to the principles of this policy. This policy has been developed taking into consideration the fact that the Group's activities and operations are considered to have a low environmental impact

Legal framework (United Kingdom)

This Policy applies to SAFO Group's operations in the United Kingdom and is designed to ensure full compliance with applicable UK environmental legislation. The principal legislation includes the Environmental Protection Act 1990 (including the section 34 duty of care in relation to waste), the Environment Act 2021, the Climate Change Act 2008 (under which the UK is committed to achieving net zero greenhouse gas emissions by 2050), the Waste (England and Wales) Regulations 2011 (which give effect to the waste hierarchy and the duty of care) and the Hazardous Waste (England and Wales) Regulations 2005.

The Group also complies with the workplace recycling requirements introduced under the Environment Act 2021 ("Simpler Recycling"), which have applied to workplaces in England since 31 March 2025 and require the separation of dry recyclable materials, food waste and residual (non-recyclable) waste.

3. Principles and general rules

3.1. Monitoring the legislative and regulatory environment to ensure full compliance with applicable requirements

The Group is constantly monitoring the legislative and regulatory environment.

The monitoring and updating of reference regulations is ensured by professional consultants which the Group uses, subscriptions to sector publications and newsletters, consultation of official sources including legislation.gov.uk and guidance published by the Department for Environment, Food and Rural Affairs (DEFRA) and the Environment Agency. The Group's legal department and the legal advisors for each location, are responsible for coordinating monitoring and updating activities.

For each update that has an impact on the Group, a detailed assessment is conducted, and the implementation of the necessary actions is planned in order to ensure compliance within the necessary timeframe.

3.2. Involvement and participation of staff and third parties in the process of continuous improvement and prevention in the field of environmental protection

Management disseminates the environmental policy inside and outside the Group by making it available on company websites and intranets and by organizing periodic training and information initiatives.

Management encourages the proposal by staff of initiatives aimed at improving environmental protection, through the collection and evaluation of such initiatives by the HR Department, the legal department and Management. Staff can submit their proposals by email or personally by requesting an interview.

[1] According to Art. 5, paragraph c of Legislative Decree no. 152/2006, environmental impact is the qualitative and/or quantitative, direct and indirect, short and long term, permanent and temporary, single and cumulative, positive and negative alteration of the environment, understood as a system of relations between anthropic, physical, chemical, natural, climatic, landscape, architectural, cultural and economic factors, as a consequence of the implementation of plans or programmes on the territory or the realization of projects relating to particular plants, works or public or private interventions, as well as the implementation of the relative activities.

3.3. Adoption of conscious behaviours aimed at reducing the consumption of resources and the production of waste

Training and information campaigns are organized in order to disseminate behaviours aimed at reducing consumption and waste production.

The choice of hybrid or electric vehicles for the group's corporate fleet is encouraged, subject to the availability of such vehicles on the market and to economic sustainability.

The use of public transport is favoured since the UK headquarters is accessible to many public transport routes.

The group is gradually installing and making available charging stations at its different sites, in order to make the gradual replacement of vehicles in the company's fleet feasible, with the goal that it will consist of electric vehicles only by 2028.

The multifunctional machines used in the company for printing and copying use green technology.

Continuous and progressive digitization of processes is developed, reducing the use and interchange of paper documentation and its impact in terms of paper production and transport.

This is achieved thanks to the dematerialization of paper documents in the first stage of the processing, but above all thanks to agreements made with counterparties to exchange flows instead of exchanging documents. Safo, as part of its fine management service, has entered into agreements with UK authorities issuing traffic violation notices in order to eliminate the first paper notification to the rental/ leasing company, through an exchange of flows relating to the data of lessees for the purpose of fulfilling the obligation to identify the offender. In addition, Safo is able to manage Transfer of liability by email to many UK Issuing authorities, reducing the use of paper, this type of management eliminates the need for physical delivery of letters, with an impact on the CO2 emissions associated with deliveries.

The Group has reduced the use of plastic bottles by installing water dispensers for staff use and providing reusable water bottles.

The implementation of systems to reduce consumption at Group sites is periodically evaluated.

3.4. Waste management favouring recovery and recycling

A separate waste collection system is adopted at Group sites in full compliance with applicable UK legislation, including the workplace recycling requirements under the Environment Act 2021 (“Simpler Recycling”) and the waste hierarchy under the Waste (England and Wales) Regulations 2011.

The collection and disposal of hazardous and controlled waste is managed in accordance with the statutory duty of care under section 34 of the Environmental Protection Act 1990 and the Hazardous Waste (England and Wales) Regulations 2005, using only authorised waste carriers and facilities and retaining the required waste transfer and consignment documentation.

Training and information campaigns are organized to ensure that the methods to be adopted to correctly manage and maximize separate waste collection are known and understood.

3.5. Adoption of procurement policies favouring environmentally aware suppliers, sustainable products and services

The supplier selection and qualification process includes assessment of commitment to environmental protection and sustainability.

Compliance with the Group's environmental policy is included as a contractual requirement.

The selection of products, materials and services to be purchased/leased includes Life Cycle Assessments

and favours low consumption, low environmental impact and recyclability.

3.6. Improvement of environmental performance

Environmental performance improvement objectives are defined.

Specific Key Performance Indicators (KPIs) are established and monitored to assess the progress of environmental performance and the achievement of defined objectives.

Internal audits are planned and conducted to assess the adequacy, implementation and effectiveness of policies, procedures and processes.

A periodic management review is conducted to assess the adequacy, implementation and effectiveness of management aimed at protecting the environment and the necessary actions for improvement are identified and planned.

4. Reporting

Anyone who has questions about this Policy becomes aware of a potential breach of it or has other concerns, may submit a report, even anonymously, via the platform provided by the company, which is structured in such a way as to guarantee the anonymity of the report. Alternatively, they may contact their supervisor or the Human Resources Department. It is everyone's responsibility to report any alleged or potential violations of the Code. The reporting procedure is detailed in the document entitled 'Whistleblowing Procedure.'

Reports will be investigated by qualified personnel or experts in the specific field in a manner that maximizes confidentiality.

All reported cases will be tracked to their full conclusion. If a breach of the Code is confirmed, we will take appropriate action.

We do not tolerate any retaliation against those who make a report in good faith and cooperate in the investigation. Anyone who retaliates against a person who makes a report in good faith will be subject to disciplinary action, without prejudice to other legal remedies.

Individuals who raise a genuine concern about environmental wrongdoing in the public interest are protected from detriment and dismissal under the Public Interest Disclosure Act 1998. The reporting procedure is set out in the Group's Whistleblowing Procedure.

5. References

SAFO Group Code of Ethics and Conduct
Environmental Protection Act 1990
Environment Act 2021
Climate Change Act 2008
Waste (England and Wales) Regulations 2011
Hazardous Waste (England and Wales) Regulations 2005
Public Interest Disclosure Act 1998
UN Global Compact Principles
UN 2030 Agenda – Sustainable Development Goals