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## Operating Procedure

# KOS GROUP ENVIRONMENTAL POLICY

| Rev.                  | Date       | Editorial staff | Verification | Approval          |
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## 1. PURPOSE AND SCOPE

The Kos Group, a leading Italian healthcare group operating in the Socio-Assistance Residences, Rehabilitation, Psychiatric Care and Non-Residential and Acute Care sectors, carries out its activities both in Italy, with a concentration in the Central-Northern Regions, and abroad, in Germany, through its subsidiary Charleston Holding GmbH.

The Group complies with environmental regulations and is aware of the impact that its activities may generate both directly and indirectly on the environment and climate.

Specifically, ongoing climate change is a current issue and challenge that requires adaptive capacities as well as the identification, monitoring and evaluation of certain performance indicators in the management of business operations.

In addition, the Group takes care that its activities and relations with customers, suppliers, collaborators and partners, both commercial and noncommercial, also take into account environmental impacts in order to minimise any negative effects that could affect the quality of the environment.

Environmental impacts, defined by EMAS Regulation 761/2001 as 'changes to the environment resulting from an organisation's activities, products and services', are distinguished into direct - directly related to production, distribution and organisational processes - and indirect - over which companies cannot exercise total management control.

## 2. DIRECT ENVIRONMENTAL IMPACTS

The direct impacts generated by its operational sites are related to:

- Consumption of energy and water resources;
- Climate-altering gas emissions;
- Consumption of goods and materials;
- Production of waste and similar.

The following is a non-exhaustive list of some of the measures and interventions that KOS has designed and implemented to achieve the reduction of direct impacts, including impacts resulting from a potential failure to adapt to climate change. The measures listed do not exhaust KOS's approach, which is based on continuous improvement and periodic assessment of emerging environmental impacts, in line with the requirements of the sustainability standards adopted.

### 2.1 Improvement of energy utilisation systems through the definition of a Group standard, including

- Continuous improvement of energy performance through the promotion of new energy efficiency measures in its building stock;
- Use of low-consumption lighting systems using LED technology and low-consumption hardware/IT equipment;

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- Raising staff awareness with regard to reducing excesses in the use of energy resources;

## **2.2 Use of renewable energies with low climate-altering gas emissions, through:**

- Installation of photovoltaic systems on the roofs of residential structures;
- Supply of electricity to the greatest extent possible from renewable sources;

## **2.3 Food waste**

- Installation of a computerised meal reservation system to accurately identify production needs, contain energy, gas and water consumption and reduce food waste;

## **2.4 Attention to the proper collection and disposal of waste produced by:**

- Maximisation of the share of waste that can be sent for recycling/reuse;
- Extension of separate collection for all types of waste produced;
- Constant verification of the correct disposal of waste that cannot be recycled/reused;
- Use of cleaning systems with multi-use containers that limit the production of plastic waste;
- Installation of drinking water dispensers in most facilities, replacing plastic bottles;

## **2.5 Use of goods and services with a lower environmental impact in their life cycle, e.g. through**

- Use of reusable printing supplies;
- Commitment to give preference, all things being equal, to purchasing goods and services locally in order to minimise the environmental impact of transport/travel;

## **2.6 Managing and reducing paper consumption by:**

- Optimisation of printing processes and increased use of electronic management for documentation and internal processes;

## **2.7 Promoting sustainable mobility, through:**

- Incentivising the use of video-calls, thus limiting business travel related to attending face-to-face meetings, especially when these involve staff from different company locations;
- Promotion of the use of environmentally friendly collective transport systems for home-to-work and work-related travel;
- Progressive inclusion of vehicles using low- or zero-emission propulsion systems in the company fleet.

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### 3. INDIRECT ENVIRONMENTAL IMPACTS

#### 3.1 Business with Suppliers

The Group pursues a procurement management that gives preference to suppliers who adopt environmentally sustainable management practices and technologies and provide products and services with less environmental impact, equal functionality and available on equal terms.

#### 3.2 Activities towards employees

It provides for the dissemination, through awareness-raising and training activities, of useful information on how to apply the company's environmental protection practices.

### 4. RESPONSIBILITY

The procedure defines roles and responsibilities in promoting and ensuring compliance with this policy.

The General Management of the Kos Group and the Managing Director are responsible for ensuring that this procedure is applied.

### 5. MONITORING, REPORTING AND AUDITING

The Group regularly updates, detects and reports on its environmental impacts in order to update the system of measures and actions mentioned accordingly. Relevant activities in this regard include, in particular:

- Monitoring of consumption, climate altering gas emissions and special waste production;
- Listening to relevant stakeholders in order to understand their expectations in relation to the management of environmental issues

### 6. SUPERVISORY BODY PURSUANT TO LEGISLATIVE DECREE 231/2001

The Group's Supervisory Board promptly informs the corporate bodies of any critical issues it detects in the performance of its activities related to the offences provided for in Legislative Decree No. 231/2001, among which environmental offences are relevant.

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## 7. TRANSMISSION OF THE PROVISIONS CONTAINED IN THE POLICY

Compliance with this procedure is required of all employees, collaborators and business partners of all group companies. It is made available through publication on corporate websites and the company intranet. Since environmental issues are systemic in nature, we also expect our business partners to take appropriate measures and steps to identify and counteract any negative impacts that they may have caused or contributed to as a result of existing business relationships.