



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Sustainability Report 2025 Icrom S.r.l.

Annual review of environmental and social performance

Publication date: 28/07/2025

Summary

1. Introduction	3
Letter from the CEO.....	4
Purpose of the document.....	5
Scope and reference period.....	6
Data collection method and sources	6
2. About Icrom S.r.l.	7
Company Profile	7
Mission, vision and corporate values.....	8
Mission	8
Vision.....	8
Company values	9
Group structure	10
3. Our approach to sustainability	10
Commitments and guiding principles	11
Sustainability governance	11
Stakeholders and stakeholder dialogue	12
4. Materiality analysis.....	13
Topics relevant to ICROM	13
Impact and risk mapping	14
5. Environmental performance.....	15
5.1. Environmental policy and objectives.....	15
5.2. Monitoring data / KPIs.....	16
5.3. Environmental projects and improvements carried out	19
5.4. Environmental compliance.....	19
6. Safety Performance.....	22



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

6.1. Security policy and objectives	22
6.2. Monitoring data / KPIs.....	23
6.3. Safety projects and improvements carried out.....	24
6.4. Compliance Security.....	24
7. Human Rights Performance	25
7.1. Policy on human rights, labour and well-being	25
7.2. Monitoring Data / KPIs	26
7.3. Initiatives and insights.....	28
7.4. Diversity, inclusion and equal opportunities	28
8. Ethical Performance	29
8.1. Business Ethics Policy	29
8.2. KPIs	30
8.3. Training and engagement initiatives	31
9. Purchasing Performance.....	32
9.1. Purchasing, work and welfare policy.....	32
9.2. KPIs	33
10. Summary and future objectives	35
11. Annexes and references	37



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

1. Introduction

The growing international focus on environmental, social and governance (ESG) issues is profoundly transforming the way companies operate, communicate and generate value. In this scenario, sustainability reporting represents a fundamental strategic tool to promote transparency, accountability and competitiveness of organizations.

Icrom S.r.l., active in the production of active pharmaceutical ingredients (APIs) and part of an international group, recognizes the importance of reporting in a clear and structured way on its performance not only economic, but also environmental and social. This document was created with the aim of providing an initial synthetic and transparent snapshot of Icrom's approach and results with respect to the main sustainability issues relevant to its context.

The report aims to describe:

- Who is Icrom, what vision guides its choices and how the company integrates the principles of sustainability into its daily management;
- The main actions and initiatives undertaken during the two-year period 2023-2024 and the first six months of 2025 to improve environmental and social performance;
- The results obtained, also expressed through key performance indicators (KPIs), relating to energy consumption, emissions, waste management, health and safety, training, staff well-being and impact on the territory.

The reporting is structured in a thematic and reasoned way, and has been developed with a practical but rigorous approach, starting from the information already available internally and strengthening the mechanisms for collecting, consolidating and analyzing data. It is a dynamic document, destined to evolve over time together with the growth of ESG culture within the organization.

With this initiative, ICROM intends not only to improve its management processes, but also to establish a more open dialogue with stakeholders, offering concrete tools to understand the company's commitment to a more responsible, safe and sustainable development.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Letter from the CEO

Dear stakeholders,

with great satisfaction we present the first sustainability report of Icrom S.r.l., an initiative that reflects our desire to strengthen dialogue with all stakeholders and to consolidate the company's commitment to responsible, transparent and sustainable development.

Icrom has been active for over 50 years in the production of active pharmaceutical ingredients (APIs), with a consolidated specialization in complex chemical processes and a strong vocation for qualitative and regulatory excellence. In this highly technical and regulatory environment, we believe that sustainability should be an integral part of our industrial strategy.

For us, sustainability is not just an abstract concept or an upcoming regulatory obligation, but a concrete and operational dimension that is expressed in daily choices: in the management of natural resources, in the safety and well-being of the people who work with us, in transparency towards the territory and our customers, and in the desire to minimize the environmental impact of our production processes.

This first document represents a starting point. We have launched an internal process of analysis and normalization of environmental and social data, with the aim of progressively improving our measurement, reporting and planning capacity. The report has been constructed in a simple but rigorous way, and takes into account the specificities of our industrial and regulatory context.

I'm aware that the road to sustainability is long and requires continuous and consistent commitment over time. But I'm equally convinced that it is the right direction, not only to meet the growing expectations of the market and society, but also to generate long-term value for Icrom, for its collaborators and for the territory in which we operate.

I thank all my colleagues who contributed to the creation of this first report and I invite all our stakeholders to read it carefully and constructively. Every suggestion, observation or cue will be precious for us to improve over time.

With esteem,

Pierfrancesco Morosini
CEO – Icrom S.r.l.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Purpose of the document

This document represents the first voluntary sustainability report drawn up by Icrom S.r.l., with the aim of offering a transparent and structured view of the company's commitment to environmental and social issues, over the three-year period 2023-2025.

The report summarizes, analyzes and assesses ESG policies, activities and results, with particular reference to the environmental and social dimensions. The drafting of this document stems from the desire to start a gradual but solid path towards integrated sustainability management, which over time can align with the main European (ESRS) and international (e.g. GRI, GHG Protocol) standards.

The specific purposes of this reporting are:

- Document the actions taken by Icrom during the year to improve its environmental and social performance;
- Monitor the main indicators (KPIs) through systematic and verifiable data collection;
- Provide an internal self-assessment tool, useful for management to plan future improvements;
- Share relevant information with internal and external stakeholders, including employees, customers, regulators, business partners, and local communities;
- Promote a corporate culture based on responsibility, ethics and continuous improvement.

This report does not yet represent CSRD or ESRS compliant reporting, but it provides a technical and cultural basis for informed regulatory obligations.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Scope and reference period

This document covers the period between 1 January 2023 and 30 June 2025, and concerns exclusively the activities carried out at the production plant of Icrom S.r.l., located in Italy, the company's sole headquarters. Other legal entities of the group to which they belong or activities carried out by third parties are not included in this report, except where expressly indicated and relevant to the context.

The scope of application includes all the company functions directly involved in the production, management and support processes, with particular reference to the following areas:

- Environment (monitoring of resources, emissions, waste, energy consumption);
- Health and Safety (accidents, training, culture of prevention);
- Personnel management (staffing, turnover, equal opportunities, training);
- Relations with the territory and stakeholders.

Data collection method and sources

The data collection for the preparation of this report was coordinated by the ESG/HSE Department, with the direct involvement of the Human Resources, Production, Quality, Maintenance and Management functions. The goal was to build a structured, verifiable and useful database for both external communication and internal management.

Sources used include:

- Internal business systems (energy balances, environmental monitoring software, HR database);
- Registers and official documentation required for environmental authorizations (AIA), quality certifications and inspection reports (ARPA);
- Safety data sheets and production reports useful for assessing the consumption of substances and raw materials;
- Training reports and accident registers for the health and safety area;
- Internal checks and system audits already existing (even if not formalized by ISO certifications);

In the absence of an ESG reporting platform, data was mainly collected in Excel format and consolidated through cross-reviews between function heads. The internal consistency of the data was verified through logical checks and comparison with historical values where available. The method will be refined in the coming years with the introduction of standardized indicators and digital tools dedicated to sustainability management.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

2. About Icrom S.r.l.

Company Profile

Icrom S.r.l. is an Italian company with a long industrial tradition, specialized in the industrial-scale production of active pharmaceutical ingredients (APIs) and chemical intermediates with high added value. Founded over 50 years ago, Icrom has established itself as a point of reference in the panorama of fine chemicals and contract manufacturing (CDMO – Contract Development and Manufacturing Organization), distinguishing itself for the quality, reliability and flexibility of its offer.

With production headquarters in Italy, Icrom operates within an international group with its headquarters in France. The company serves customers all over the world, operating mainly for the regulated market (Europe, USA, Japan), and collaborates with the main pharmaceutical multinationals, with which it establishes long-lasting and highly specialized relationships of trust.

Icrom's core business is based on complex chemical synthesis and the ability to develop and produce active molecules with high standards of quality and safety, thanks to a technologically advanced plant and a highly qualified team. The company has flexible production lines, pilot plants, areas dedicated to the handling of active substances, and an in-house analytical laboratory capable of guaranteeing rigorous controls on every phase of the process.

Icrom is authorized by AIFA (Italian Medicines Agency) for the production of APIs for human use and is regularly inspected by international regulatory authorities. The company operates in compliance with Good Manufacturing Practices (GMP) and complies with all the environmental and safety requirements imposed by the Integrated Environmental Authorization (AIA) and the Seveso legislation for plants at risk of major accident (lower class).

Icrom's offer stands out for:

- Tailor-made CDMO services, from pilot to commercial production;
- Experience with complex molecules, including potentially hazardous or sensitive substances;
- Fast response times and collaborative approach in development projects;
- Complete internal quality control (chemical, microbiological, environmental);
- Technical-regulatory support for dossier management.

The real strength of Icrom lies in the value of the people who work there: a cohesive, competent and passionate team, capable of facing complex challenges with team spirit and solution orientation. The corporate culture is based on continuous improvement, integrity and respect for the customer and the environment.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

In a constantly evolving sector such as that of pharmaceutical chemistry, Icrom proposes itself as an agile, reliable and sustainable partner, capable of combining scientific rigor, industrial efficiency and social responsibility. With a clear vision and a strong focus on sustainability, the company intends to consolidate its leadership position among European API manufacturers and accompany its customers towards a future of health, innovation and responsibility.

Mission, vision and corporate values

Mission

The mission of Icrom S.r.l. is to actively contribute to the advancement of global health, through the production of high-quality active pharmaceutical ingredients (APIs), made with safe, controlled and environmentally friendly processes. We work to be a trusted partner for pharmaceutical companies and regulatory authorities, ensuring maximum reliability in terms of product quality, regulatory compliance and business continuity.

Our work is based on a rigorous scientific approach, supported by consolidated technical skills and a long experience in fine chemicals and in the management of complex processes. The daily goal is to offer products and services that meet not only the technical and quality requirements, but also the expectations of our stakeholders in terms of safety, ethics and sustainability.

We are aware of the delicacy of the sector in which we operate: every molecule produced can have a direct impact on people's health. For this reason, our mission translates into a constant dedication to improvement, attention to detail and risk prevention at every stage of the production cycle.

Vision

Our vision is to become a reference company in the European panorama of API production, recognized not only for its technical excellence, but also for the environmental and social responsibility that permeates our every choice. We imagine a future in which the chemical-pharmaceutical industry knows how to combine innovation and sustainability, actively contributing to the transition to low-impact production models with high human value.

For Icrom, being sustainable does not only mean reducing emissions or containing waste: it means rethinking the way we operate, from the raw materials used to the enhancement of the people who work with us. It means focusing on prevention, training, transparency and respect for the social and territorial context in which we are inserted.

In the long term, we want to consolidate our strategic position in the API sector also through an evolved corporate culture, capable of reading the transformations taking place, anticipating regulatory changes and responding to global challenges – first and foremost the environmental one – with competence, awareness and concreteness.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Company values

The values of Icrom S.r.l. They represent the common thread that binds our corporate identity, relations with our stakeholders and the strategic choices we make every day. These are not abstract statements, but concrete operating principles that guide our organizational culture.

- **Quality:** The concept of quality goes beyond compliance with technical or regulatory requirements. For Icrom, it means ensuring consistency, precision and reliability in every activity, from the laboratory to production. It means ensuring that every single batch is made with the utmost care, according to international standards, because the health of the end patients also depends on us.
- **Responsibility:** We are aware of the direct and indirect consequences of our actions. This is why we adopt a responsible behavior towards the environment, people and the community. Responsibility is reflected in the ethical management of the company, in the transparency of communications, in the attention to detail, in compliance with the laws and in compliance with the limits imposed by authorizations.
- **Safety:** Safety at work is a top priority. We firmly believe that every accident is avoidable through prevention, training and continuous attention. We invest resources in the protection of workers, in the maintenance of plants and in the consolidation of a shared safety culture at all levels.
- **Innovation:** Innovation is the basis of our competitiveness and our future sustainability. We experiment with new processes, adopt more efficient technologies and invest in the know-how of our staff to continuously improve technical, environmental and organizational performance. Innovation is a continuous and collaborative process for us.
- **Transparency:** We operate in an open and verifiable manner, communicating honestly and promptly with customers, authorities, employees and partners. We believe that transparency is an essential condition for building trust, preventing reputational risks and consolidating long-term relationships.
- **Collaboration:** We believe in the value of people and the power of teamwork. We promote a climate of listening, mutual respect and sharing of knowledge, because everyone's contribution is essential to achieve common goals. Internal and external collaboration is the basis of our resilience and ability to evolve.

These values are not static, but evolve with the company and the context in which we operate. They represent the ethical and operational compass that will also guide us on our path of transition towards an increasingly sustainable, participatory and responsible model.



ICROM S.r.l. - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Group structure

Icrom is part of the Proxis Développement group, a family-owned French industrial holding company, active internationally. The group is structured into four main areas of activity: AQUAPROX, focused on industrial water treatment and process chemistry; BIOPROX, engaged in the development of biotechnological solutions for nutrition and agriculture; SOZIO, specialized in the creation of aromatic solutions for the perfumery, cosmetics and detergents industry; and finally ICROM, a center of excellence for the production of high-potency active pharmaceutical ingredients (APIs) and GMP intermediates.

The entire work of the group is based on an integrated approach to sustainability, inspired by the "One Health" vision, which promotes the balance between human, environmental and social health, with a strong commitment to ethics, corporate social responsibility and the creation of shared value throughout the supply chain.

3. Our approach to sustainability

For Icrom S.r.l., sustainability is a transversal guiding principle that is reflected in all dimensions of our production, organisational and management activities. In a highly regulated industrial context such as the pharmaceutical one, sustainability cannot be an accessory or theoretical element, but must be integrated in a concrete and operational way into the daily life of the company.

At Icrom, we understand sustainability as the ability to combine industrial competitiveness, safety, quality and respect for the environment and people. Our business is based on the adoption of responsible practices in the management of natural resources, waste, hazardous substances, as well as on the promotion of the health, safety and well-being of workers.

We understand that our industry has significant environmental impacts and operational risks. Precisely for this reason, sustainability for us means taking responsibility for the impacts generated, preventing them where possible and mitigating them through technologies, controls, training and continuous improvement.

We have begun a concrete process of mapping environmental and social priorities, collecting data, defining indicators and progressively aligning with the standards expected at European level. This first reporting is an important step in this direction.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Commitments and guiding principles

ICROM is committed to acting in accordance with the following guiding principles, which form the basis of our approach to sustainability:

- Legality and regulatory compliance: we operate in full compliance with environmental, health and safety laws, and regulatory requirements related to the production of active pharmaceutical ingredients.
- Prevention and continuous improvement: we take a proactive approach to risk management, investing in plant maintenance, training and data analysis to reduce impacts and increase efficiency.
- People-centricity: we put our employees at the centre, promoting safe, inclusive working conditions based on mutual respect.
- Ethics and transparency: we adopt honest, traceable and verifiable behavior, in line with the principles of our Code of Ethics.
- Environmental responsibility: we are committed to reducing our environmental impact through the rationalization of consumption, proper waste management and energy efficiency.
- Involvement and listening: we recognize the value of dialogue with internal and external stakeholders as a lever for the sustainable evolution of the company.

Starting from these principles, ICROM has defined a series of internal policies on ethical, environmental, social and anti-corruption issues, which will be progressively updated and formalized to meet regulatory and market expectations.

Sustainability governance

To date, ICROM has embarked on a path of progressive construction of its sustainability governance. Environmental and social activities are coordinated in an integrated manner through the direct involvement of the main company functions: HSE (Health, Safety & Environment), General Management, HR and Production.

Operational responsibilities are distributed according to a collaborative model:

- The HSE Department is responsible for environmental and safety management, with monitoring, control and regulatory updating functions;
- Human Resources deal with personnel management, training and organizational well-being;
- The Directorate provides strategic direction and ensures coordination between the environmental, social and economic areas;
- The Production department participates in the implementation of operational measures and the day-to-day management of environmental and safety aspects.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Stakeholders and stakeholder dialogue

ICROM recognizes the importance of dialogue with its stakeholders as a central element for an effective and shared approach to sustainability. Although the company has not yet activated formal stakeholder engagement processes (e.g. surveys, interviews or forums), it maintains regular and constructive relationships with the main categories of stakeholders.

The stakeholders identified as priorities are:

- Employees: our first point of contact, direct recipient of company policies on safety, training and well-being;
- Customers: national and international pharmaceutical companies that require quality, reliability, compliance and progressive attention to ESG issues;
- Regulatory authorities: including AIFA, ARPA, and environmental control bodies, with which Icom maintains a transparent and collaborative relationship;
- Suppliers and partners: selected on the basis of technical, reliability and, in perspective, also environmental and social criteria;
- Local communities and territory: as a company located in an area at risk of Seveso, Icom is aware of its responsibility towards the territorial context and citizenship;
- Parent company and international group: with which they share common strategic objectives, also with a view to sustainability.

In the coming years, ICROM intends to structure more formalized consultation and dialogue tools, also through the adoption of methodologies provided for by European legislation (e.g. stakeholder mapping, participatory materiality analysis).



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

4. Materiality analysis

In line with the desire to launch a path of awareness and reporting on ESG issues, we have selected the priority topics on the basis of internal knowledge, the direct experience of the department heads and the qualitative assessment of the potential impacts associated with our activities.

The selection focused on two main areas:

- Environment: as a chemical plant subject to Integrated Environmental Authorization (AIA) and Seveso classification as a lower risk, environmental management has always been at the center of our responsibilities and represents an area of technical, regulatory and strategic attention.
- Social: as a company with about 100 employees, we believe it is essential to carefully monitor aspects related to health and safety, worker well-being, training and respect for fundamental rights, also with a view to attracting and retaining people.

Topics relevant to ICROM

On the basis of the considerations described above, Icrom has identified the following issues relevant to its production and organisational reality:

Environment

- Management of energy consumption and natural resources
- Reduction of greenhouse gas emissions (GHG Scope 1 and 2)
- Hazardous waste management and reduction
- Wastewater Management and Impact on Drains
- Regulatory compliance and prevention of environmental risks
- Control of emissions into the atmosphere (VOCs, dust, other pollutants)
- Sustainable management of chemicals

Social

- Occupational health and safety (accidents, prevention culture)
- Technical and transversal training of personnel
- Well-being and corporate climate
- Skills enhancement and professional development
- Fairness and decent working conditions
- Contractual stability and industrial relations
- Inclusion and respect for human rights



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

These issues represent the starting point for our reporting process and will be the subject of a more structured in-depth study in the coming years with the active involvement of internal and external stakeholders.

Impact and risk mapping

ICROM carried out a preliminary mapping of the potential impacts and risks associated with the relevant issues identified. This qualitative analysis was conducted starting from the knowledge of the production processes, regulatory obligations and operational risks already monitored in the internal systems (e.g. HSE, quality, safety).

The following table summarises the main impacts and risks, distinguishing between impact on the environment and society (inside-out) and risk on the company (outside-in), according to the principle of double materiality:

Theme	Impact (on the environment/society)	Risk to the company (consequences)
GHG emissions	Contribution to climate change	Rising energy costs, regulatory pressures
Hazardous waste	Soil and water pollution	Sanctions, revocation of authorizations
Energy and resource use	Environmental degradation	Cost instability, procurement
Occupational safety	Accidents, personal injury	Business interruption, loss of reputation
Training and skills	Inadequate professional growth	Drop in productivity, high turnover
Well-being and indoor climate	Motivation and involvement	Difficulty in retaining staff
Inclusion and human rights	Exclusion, discrimination	Internal conflicts, reputational damage
Water and wastewater management	Local environmental pollution	AIA non-compliance, ARPA sanctions
Environmental compliance	Impact on air, water, soil	Legal risks, plant downtime

This matrix allows us to focus on the priorities for action and identify, even gradually, the areas in which to invest in terms of measurement, monitoring and continuous improvement. In the coming years, ICROM intends to strengthen this analysis through the integration of specific tools (e.g. ESG SWOT analysis, stakeholder consultation, ESRS standards).



ICROM S.r.l - A Company of *Proxis Developpement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

5. Environmental performance



5.1. Environmental policy and objectives

ICROM S.r.l. adopts an Environmental Policy based on the prevention of pollution, the protection of natural resources and the continuous improvement of its environmental performance. Sustainability is recognized as a shared responsibility and as a strategic lever for the company's competitiveness and resilience in the long term.

The company's environmental commitment translates into concrete actions on several levels:

- Environmental integration in decision-making processes and plant management, considering the entire product life cycle, from the selection of raw materials to final disposal.
- Application of the principles of green chemistry, with the aim of minimizing the use of hazardous solvents, simplifying synthesis processes, reducing energy consumption and limiting waste production.
- Use of clean technologies and collaboration with partners and suppliers for the development of solutions with low environmental impact.
- Adoption of advanced environmental control and prevention systems, consistent with the requirements of the Integrated Environmental Authorization (AIA) and the Seveso III legislation.

Among the priority environmental objectives set by ICROM are:

- The measurement and progressive reduction of the carbon footprint (Scope 1 and 2);
- The improvement of the energy and water efficiency of the plants;
- The promotion of the reuse and recycling of materials in production cycles;
- Continuous monitoring of emissions and discharges;
- Awareness and continuous training of staff on environmental issues;
- The inclusion of environmental criteria in supplier assessments.

All objectives are accompanied by measurable environmental KPIs, which are periodically monitored through the Management Review and audit processes. The data collected supports both operational improvement and transparency in ESG reporting.



ICROM S.r.l - A Company of Proxis Développement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

5.2. Monitoring data / KPIs

Monitoring data

Water Resource	2023	2024	2025 H1
Average concentration of pollutants in wastewater (e.g. COD, BOD5, pH, heavy metals)	AIA compliant	AIA compliant	AIA compliant
Number of water-related environmental spills/emergencies per year	0	0	0
Total drinking water withdrawal – m3	38.327	34.337	13.546
Total well water withdrawal – m3	248.898	156.227	89316
% of water reused internally	55,16	41,45	35,93
Emissions	2023	2024	2025 H1
VOC emissions on t/PF	1	1	On going
Solvent consumption per ton of APIs	11	12	On going
Energy	2023	2024	2025 H1
Total energy consumption Kwh	3.422.435	3.098.792	1.669.999
Total renewable energy consumption	21858	21658	9508
Waste	2023	2024	2025 H1
Total volume of hazardous and non-hazardous waste generated annually (kg)	2.785.684	2.856.915	1.419.891
Number of environmental accidents or non-compliant waste management events	0	0	0
Number of environmental near misses or non-compliant waste management events	0	0	4
% of Hazardous Waste on Total Waste	95	94	96
Ratio of tons of waste generated per ton of API produced	40	37	40
CO2e emissions	2022	2023	2024
CO ₂ equivalent emissions (Scope 1 and Scope 2) generated by business activities - Ton	1578	1642	1722

Conclusions:

The analysis of environmental data confirms full regulatory compliance and constant monitoring of the most critical aspects. Water withdrawal, despite physiological fluctuations, remains managed in a sustainable and emergency-free manner, while CO₂ emissions show substantial stability compared to previous years. On the energy front, consumption is in line with production activity and continuity in the use of renewable sources. Waste management shows a structured control, without accidents or anomalous events, and a constant percentage of hazardous waste, demonstrating a consolidated approach. The monitoring of near misses started in 2025 represents a further step towards continuous improvement. Overall, the results testify to a mature system oriented towards strengthening environmental practices, with the aim of continuing on the path of reducing impact and increasing sustainability performance.



ICROM S.r.l - A Company of Proxis Developpement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

Research & Development	2023	2024	2025 H1
Percentage of projects that have, in the final phase (at the development report), a number of intermediate isolations lower than estimated in the brief phase.	50	25	50
Percentage of projects where solvents are replaced with solvents of lower toxicity	0	0	0
Percentage of projects in which there is a reduction in the amount of solvent compared to the reference literature (number of projects with decrease/total projects developed)	50	100	50
Percentage of development of new processes and/or efficiency of old processes in which the yield has increased compared to the initial yield	75	75	100
Percentage of new projects developed without the use of CMR or SVHC classified substances	50	25	0

Conclusions:

During the two-year period 2023-2024 and in the first half of 2025, Research & Development activity confirmed a consistent path towards sustainable innovation. Particular attention has been paid to the reduction of solvents used, the optimization of processes and the containment of the use of hazardous substances. The results for the first half of 2025, although partial, suggest continuity compared to previous years, with room for improvement that will be monitored later in the year.

Compliance and risk	2023	2024	2025 H1
Number of environmental non-conformities detected by competent authorities or internal audits	0	0	0

Conclusions:

In the three-year period 2023-first half of 2025, no environmental non-conformities were detected, either by the competent authorities or as a result of internal audits. This result confirms the effectiveness of the company's environmental management system and testifies to the constant commitment to compliance with current regulations and risk prevention.



ICROM S.r.l - A Company of Proxis Developpement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

Formation	2023	2024	2025 H1
Number of hours of environmental training provided to employees	7140	6060	3600

Conclusions:

The data relating to the hours of environmental training shows an overall positive trend. After a slight decline recorded in 2024 compared to 2023, the first half of 2025 shows a significant recovery (+19%), a sign that attention to employee awareness of environmental issues has remained high and structured. This trend suggests that, if maintained in the second half of the year, the year 2025 could exceed 2023 levels, confirming the importance attributed to training as a strategic lever for sustainability.

Performance KPIs

Water Resource	2023	2024	2024vs2023	2025 H1	2025vs2024
Average concentration of pollutants in wastewater (e.g. COD, BOD5, pH, heavy metals)	AIA compliant	AIA compliant		AIA compliant	
Waste	2023	2024	2024vs2023	2025 H1	2025 H1 vs2024 H1
% of waste sent for recovery or recycling out of total waste	68	51	-26%	56	+10%

Conclusions:

In the three-year period considered, the company has maintained compliance with the authorization limits (AIA) regarding the quality of wastewater, demonstrating constant and effective control of its environmental impacts. In the waste sector, after a decline recorded in 2024, there is a clear sign of recovery already in the first half of 2025, with a 10% increase in waste sent for recovery. These results confirm the company's commitment to continuous improvement and sustainable management of resources.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

5.3. Environmental projects and improvements carried out

During 2025, the company has updated its scrubber fleet with the aim of improving its operational efficiency and environmental performance. The interventions concerned the installation of higher-performance components, the strengthening of control systems and the overall optimization of the system. At the same time, the budget for the installation of an afterburner was approved, a system that allows the thermal abatement of volatile organic compounds (VOCs) by combustion at high temperatures. This system represents a highly effective solution for the containment of odorous emissions and contributes to significantly reducing the environmental impact of production activities. The intervention is part of a broader investment path for the protection of the environment and the health of workers, strengthening compliance with the requirements of the Integrated Environmental Authorization (AIA) and corporate sustainability objectives.

During 2025, a revamping of the wastewater treatment plant was carried out with the aim of improving its overall performance and responding even more effectively to the production and environmental needs of the site. The update provided for the change in the treatment methodology, adopting more modern and efficient technological solutions, capable of guaranteeing a higher quality of the treated water. In addition, a new tank with a capacity of 600 cubic meters was installed, which made it possible to significantly increase the overall purification capacity of the plant. All activities were carried out in compliance with the environmental authorizations in force, confirming the company's commitment to the protection of water resources and the sustainable management of its processes.

5.4. Environmental compliance

In the three-year period 2022-2024, ICROM has consolidated a structured process for measuring and reporting its greenhouse gas emissions, in line with the guidelines of the Greenhouse Gas Protocol. The monitoring activity concerned direct emissions (Scope 1), deriving from the consumption of fossil fuels for thermal plants and the company fleet, and indirect emissions (Scope 2), associated with the purchase of electricity from the national grid.

The data show that the majority of overall emissions is attributable to Scope 2, which is related to the electricity consumption of production processes, while Scope 1 mainly reflects the use of methane for heating and fuels for company vehicles. In 2024, overall emissions remained in line with previous years, with values of around 470 tCO₂e for Scope 1 and over 1,120 tCO₂e for Scope 2. This trend confirms the stability of consumption, but also highlights the importance of energy efficiency and decarbonisation policies.

On the next page an excerpt from the study:



ICROM S.r.l - A Company of Proxis Développement Group

Share Capital: € 2,000,000 i.v.

Registered Office

Sede Amministrativa e Stabilimento/Headquarters and Plant:

Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy

Tax Code/VAT number IT00828970152

R.E.A. 773364

MECHANOGRAPHIC NO. 365193

2022					2023				2024			
Emisison Sources	tCO2	% of each scope	%	Refer	tCO2	% of each scope	%	Refer	tCO2	% of each scope	%	Refer
Scope 1												
Stationary combustion – Natural gas	414,029262	85,7	31	GHG Protocol / DEFRA	448,010394	86,2	32	GHG Protocol / DEFRA	494,980284	86,8	36	GHG Protocol / DEFRA
Stationary combustion – Diesel	1,3375	0,3			1,3375	0,3			0	0,0		
Mobile combustion – Company petrol vehicles	5,93574334	1,2			6,13775487	1,2			6,59045775	1,2		
Mobile combustion – Company diesel vehicles	61,845	12,8			63,949	12,3			68,738	12,1		
Refrigerant gas losses (HFC, PFC, SF6)	0	0,0			0	0,0			0	0,0		
Scope 2												
Purchased electricity (location-based)	1094,565	100%	69	GHG Protocol / DEFRA	1122,19	100%	68	GHG Protocol / DEFRA	1015,45	100%	64	GHG Protocol / DEFRA



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

The path taken has made it possible to obtain greater accuracy in data collection and to transform the measurement of emissions into a tool to support strategic decisions. Among the actions already launched are the optimization of plants, the increase in the share of self-produced energy from photovoltaics and the definition of a goal for 2025 to source at least 30% from certified renewable sources.

The next step will be to extend the scope of calculation to Scope 3 emissions, to also include indirect emissions along the value chain (transport, supplies, product use), so as to have a complete view of our climate impact and plan targeted reduction interventions. This commitment confirms Icrom's desire to align with international standards and to integrate sustainability into the corporate strategy as a competitive lever and responsibility towards the environment.

Reference attachment n°1



ICROM S.r.l. - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

6. Safety Performance



6.1. Security policy and objectives

ICROM S.r.l. considers the protection of health and safety at work to be a fundamental value, integrated into decision-making processes and corporate strategy. The goal is to ensure safe working environments, prevent injuries and reduce risks at source, promoting a shared safety culture at all levels of the organization.

Security is addressed through a structured and proactive approach, which includes:

- Systematic risk assessment and management, with particular attention to those arising from chemical agents, explosive atmospheres and processes at risk of major accidents.
- Safe design of plants and modifications, in which each change is analyzed according to its impact on safety and shared with those responsible for quality and environmental systems.
- Continuous and targeted training, differentiated by role and area, with the aim of increasing awareness and safe behavior of workers.
- Active involvement of staff through structured observation and reporting systems, internal audits, and continuous feedback.
- Scheduled and predictive maintenance of critical equipment, supporting accident prevention and business continuity.

ICROM is classified as a plant at risk of major accident pursuant to Legislative Decree 105/2015 (Seveso III – lower threshold) and has implemented a Safety Management System for the Prevention of Major Accidents (SGS-PIR). The system applies to all plant activities and includes operational control, change management, contingency planning, audits, performance indicators (KPIs) and management review.

Key safety performance indicators monitored include:

- Rate of frequency and severity of injuries;
- Number of reports and observations relating to unsafe behavior;
- Percentage of training completed compared to the annual plan;
- Results of inspections and emergency simulations;
- Status of prevention and control measures in plants at risk.

Continuous improvement is pursued through the PDCA (Plan – Do – Check – Act) cycle, with periodic reviews of policy, risks and performance. The involvement of all staff is an integral part of the strategy, including through bottom-up reporting tools and internal dialogue.

6.2. Monitoring data / KPIs

Monitoring data

	2023	2024	2025 H1
Compliance	Compliant	Compliant	Compliant
Suppliers assessed with OSH criteria	15	15	15
Contractor accidents/injuries	0	0	0
Periodic emergency simulations	Compliant	Compliant	Compliant

Conclusions:

The data confirm effective safety management: full regulatory compliance, no accidents between contractors and correct execution of emergency simulations. Suppliers have also been selected according to SSL criteria, guaranteeing a responsible supply chain.

Performance KPIs

	TARGET	2023	2024	2024vs2023	2025 H1	2025vs2024
Percentage of personnel trained in Health and Safety.	100% within the first year.	100	100		100	
Frequency of accidents - number of serious accidents >12 days of proniosis	0	1	0		0	
Severity of accidents - Days of absence x 1,000 / Total hours worked	<0.15	0,08	0		0,06	
% of internal audits conducted on the OSH system - Completed audits / planned audits	90%	N/A	100	\	100	
Improvement actions implemented following reports - Actions closed on time / total actions	≥ 85%	N/A	100		70 Data being updated	

Conclusions:



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

The analysis of Performance KPIs in the Health and Safety area shows a very positive picture in the three-year period considered. Staff training has consistently reached 100%, demonstrating a structural commitment to prevention. After the only serious injury recorded in 2023, there were no more similar events in 2024 and the first half of 2025, with a severity index well below the target. Corrective actions in response to reports are also implemented on time, a sign of a responsive and responsible management system.

6.3. Safety projects and improvements carried out

During 2025, we expanded our production structure with the introduction of a department dedicated to the management of high potency active ingredients (HP – High Potency). This investment represents a further step forward in our commitment to protecting the health and safety of workers. The new department has been designed according to the highest international standards in terms of containment, protection and environmental monitoring, providing pressure-controlled environments, advanced isolation systems and dedicated cleaning processes.

The goal is to ensure the safe handling of critical substances, without compromising on employee health, product integrity and environmental protection. The introduction of the HP department is part of a broader strategy of responsible growth, demonstrating how technological innovation and worker safety can go hand in hand.

6.4. Compliance Security

During 2025, the company confirmed its concrete commitment to ensuring safe work environments that comply with current legislation. In particular, full compliance with the Consolidated Law on Safety (Legislative Decree 81/08) has been maintained, through the application of a structured safety management system that provides for continuous risk assessment, constant staff training and the adoption of updated operating procedures.

During the year, the checks carried out by INAIL on pressure systems (PED) were concluded with a positive outcome, confirming the correctness of the technical, documentary and maintenance management of the systems subject to specific regulations. These results are the result of careful planning of interventions and active collaboration between the HSE and maintenance departments.

In addition, it should be noted that no reports of occupational diseases by workers have been recorded, an important signal that testifies to the effectiveness of the preventive measures adopted. Continuous attention to the health of employees, also through the constant monitoring of job-specific risk factors, is a corporate priority that is not only regulatory but also ethical. These results, combined with the daily work of internal awareness, strengthen the culture of safety as a shared value, an integral part of Icrom's organizational model.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

7. Human Rights Performance



7.1. Policy on human rights, labour and well-being

ICROM S.r.l. recognizes the central value of people in ensuring the sustainability and competitiveness of the company in the long term. For this reason, it promotes a work culture based on legality, respect, transparency and inclusion, inspired by the main international references in the field of human rights and decent work.

The company's commitment is consistent with:

- The Universal Declaration of Human Rights;
- The Fundamental Conventions of the International Labour Organization (ILO);
- The national legislation in force on health, safety and contractual conditions;
- The UN Convention on the Rights of the Child and ILO Conventions No. 138 and 182 on child labour.

ICROM is committed to:

- Guarantee a safe, healthy working environment that complies with Legislative Decree 81/2008;
- Prohibit all forms of forced labour, whether compulsory or minor, at every stage of the production chain;
- Promote equal opportunities and inclusion, combating all forms of discrimination related to gender, age, religion, sexual orientation, disability or personal opinions;
- Respect fair and transparent schedules, rests and contractual conditions;
- Ensure pay equity, monitoring any disparities and ensuring decent pay, in line with role and skills;
- Promote work-life balance, including through flexible working methods, smart working and protection of the right to disconnect;
- Valuing diversity and experience, integrating senior skills in intergenerational paths;
- Apply meritocratic and transparent criteria in selection, promotion and development processes;
- Actively involve workers' representatives in relevant decision-making processes;
- Promote continuous training on technical, regulatory and transversal issues.



ICROM S.r.l - A Company of Proxis Développement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

The ICROM approach is fully aligned with DEI (Diversity, Equity & Inclusion) principles and corporate social responsibility. The implementation of the policy is supported by specific KPIs (Key Performance Indicators), monitored on a regular basis and reported in the ESG audit and reporting processes.

7.2. Monitoring Data / KPIs

Monitoring data

	2023	2024	2024vs2023	2025 H1	2025 H1 vs2024 H1
Number of hours of training provided per employee per year	777	884	+14%	127	-71%
Extraordinary average per employee	67	36	-47%	21	-42%

Conclusions:

The observed fluctuation in the number of training hours per employee between 2023 and 2024 is mainly due to the activation of a company English course, which significantly affected the total hours provided in both years. This extraordinary intervention has temporarily raised the values recorded, but it is not the norm. The figure for the first half of 2025, in fact, reflects a return to a more balanced situation in line with actual training needs. It is expected that the annual value of 2025 will be consistent with what was recorded in the first half of the year, confirming a stabilization of training at sustainable levels that are more representative of the company.

The total number of hours worked is growing steadily, with an increase of +2% in 2024 compared to the previous year and a further +3% recorded in the first half of 2025 compared to the same period of the previous year. This trend highlights greater production continuity and a good level of business operations.

Monitoring data

	2023	2024	2025 H1
Number of employees	95	95	100
Percentage of employees covered by health insurance	100	100	100
Number of employees covered by workers' representatives	23	20	21
Number of employees with personal development plan	0	3	10
Number of internal recruitment cases	4	3	1
Number of employees covered by second-level contract	100	100	100
Number of hours worked	158.666	161.669	83.040
Number of employees trained on issues of discrimination or harassment	\	\	34
Number of reported cases of child or forced labour	0	0	0
Percentage of women employed across the organization	31	29	27



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Percentage of women in positions of responsibility or technical roles	11	10	9
Percentage of workers belonging to minorities and/or vulnerable workers employed in relation to the entire organization;	4	3	3
Voluntary staff turnover rate	13	8	3
Percentage of employees who report having a good work-life balance	\	\	67
Number of corporate welfare initiatives activated each year	2	1	2
Percentage of employees who benefit from flexible working tools (agile work, part-time, flexible working hours)	62	66	64
Percentage of employees who perceive their remuneration as fair compared to the tasks performed	\	\	33
Number of periodic meetings held between Management and workers' representatives.	6	8	4
Percentage of jobs and levels with no pay discrepancies greater than 10% - Target $\geq$ 90%	98	98	98

Conclusions:

In the three-year period analyzed, Icrom has consolidated its commitment to ensuring fair, safe working conditions oriented towards the well-being of employees. Full health coverage, the absence of cases of forced or child labor and total contractual adherence confirm a mature system of protection of rights. The company has also promoted welfare initiatives and flexibility tools, promoting a better work-life balance and greater internal satisfaction. The decline in turnover and the launch of training programs on ethics, diversity and equal opportunities highlight an inclusive and responsible growth path, with room for improvement linked to the presence of women in technical and responsibility roles.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

7.3. Initiatives and insights

In 2025, Icom conducted an in-depth technical assessment to verify the compliance of its remuneration system with the international parameters of *Living Wage*, with reference to the official data of the Lombardy Region published by the *WageIndicator Foundation*. The analysis confirmed that the minimum hourly wage paid to ICROM employees is well above both the minimum and maximum living wage calculated for the region. This evidence concretely demonstrates the company's alignment with the most advanced standards of equity and social sustainability.

The choice to adopt the *Living Wage* as a reference, although not mandatory by law, represents for Icom a clear desire to promote the well-being of workers, social justice and a decent wage as a universal right. The initiative is consistent with the company's ESG strategy and constitutes an element of strength in the relationship with its stakeholders. The company is committed to maintaining monitoring on an annual basis and to integrating the principle of fair wages into its welfare and pay transparency policies, including in future ESG reports and the Impact Report. See attachment n°2

7.4. Diversity, inclusion and equal opportunities

During 2025, the company strengthened its concrete commitment to the promotion of diversity, inclusion and equal opportunities, recognizing its strategic value for the sustainable growth of the organization and the well-being of people.

A first fundamental step was the launch of targeted training activities, aimed at all staff, with the aim of raising awareness on the issues of diversity, respect for differences and equal treatment. The training content also included references to human rights and professional ethics, creating widespread awareness and nurturing a more inclusive corporate culture.

In parallel, a structured procedure for the selection of staff has been established, based on objective, transparent and non-discriminatory criteria. This process ensures that each candidate is evaluated solely on merit, skills and potential, without distinction related to gender, age, sexual orientation, origin, religion or other personal characteristics.

To complete the process, the company has defined and activated a career development plan, aimed at ensuring equity in internal growth opportunities. The plan provides for individualized paths, structured performance evaluations and access to training and updating tools, with the aim of enhancing the talent and aspirations of the employee.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

8. Ethical Performance



8.1. Business Ethics Policy

ICROM considers ethics a founding element of its corporate identity and an essential reference for all internal and external activities. During 2025, the company continued to promote a culture of integrity, inspired by the principles contained in the company's Ethics Policy, applicable to all employees, collaborators, consultants, suppliers and other parties in business relationships.

The company's commitment has been realized through:

- Compliance with current national and international laws and regulations in all the countries in which it operates.
- The fight against all forms of corruption, including in relations with public or private bodies, by promoting fair and transparent business practices.
- The prevention of conflicts of interest, through the awareness and careful management of any situation that may compromise the impartiality and objectivity of decisions.
- The fight against all forms of money laundering, promoting internal controls and widespread responsibility.
- The rejection of anti-competitive practices, protecting fair competition and the fairness of market dynamics.
- The protection of confidential information, with a structured IT security and access control system.
- The implementation of whistleblowing mechanisms, to allow the secure and anonymous reporting of any violations, without the risk of retaliation.

The adoption of these principles was accompanied by dedicated training sessions, the development of consistent internal documentation, and continuous monitoring of compliance with ethical rules. The integration of the Ethics Policy into company procedures is a key element of the governance system and an essential factor for the company's credibility with stakeholders, customers and collaborators.



ICROM S.r.l - A Company of Proxis Développement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

8.2. Monitoring Data / KPIs

Performance KPIs

	TARGET	2023	2024	2024vs2023	2025 H1	2025vs2024
Percentage of employees trained on corporate ethical principles.	20% within the first year.	\	\	\	30%	
Number of ethics reports received through official channels	0%	0	0		0	
Percentage of suppliers evaluated with ethical criteria.	60%	N/A	N/A	N/A	91	

Conclusions:

In the first half of 2025, Icrom exceeded its business ethics targets, training 30% of staff on internal ethical principles, well above the 20% target set for the full year. The absence of reports through official channels highlights a corporate climate based on respect and transparency. In addition, the integration of ethical criteria in the evaluation of suppliers (91%) confirms the desire to extend corporate values throughout the supply chain.

Monitoring data

	2023	2024	2025 H1
Number of reports received through internal ethics channel and consequent actions.	0	0	0
Number of litigations related to infringements of competition rules.	0	0	0
Level of satisfaction with the company's ethical climate.	x	x	Beyond Sufficiency*

*65% of total respondents

Conclusions:

The data collected in the three-year period indicate a business context characterized by high integrity: no reporting through the ethical channel, no disputes related to competition and, although the data on satisfaction is not yet available, the trend suggests a stable and positive ethical climate. These results reflect an effective governance system and widespread ethical behavior.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

8.3. Training and engagement initiatives

In 2025, ICROM launched a structured internal training course on ESG (Environmental, Social and Governance) issues, with the aim of increasing the awareness and competence of its employees with respect to issues central to sustainability and corporate responsibility. In particular, the training modules focused on diversity and inclusion, human rights and ethics, promoting a work environment that is increasingly fair, respectful and consistent with company principles.

The training involved staff from the different departments, through face-to-face sessions and digital content, and was designed to stimulate active involvement, critical reflection and cultural alignment on shared values. This approach has helped to integrate ESG issues more into daily practices and internal decision-making processes.

To complete this process, the company administered the first ESG satisfaction questionnaire, with the aim of collecting direct feedback from participants and further improving future training initiatives. The initial results show a good level of appreciation and interest, confirming the effectiveness of the strategy adopted and the importance of continuing to invest in the conscious growth of people.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

9. Purchasing Performance



9.1. Purchasing, work and welfare policy

In 2025, ICROM continued to implement a procurement policy based on criteria of economic, environmental and social responsibility, in full consistency with the provisions of the Procurement Policy. The approach adopted is based on the belief that the supply chain is an extension of the company's identity and values, and therefore must be managed with transparency, fairness and attention to ESG performance.

In particular, the following commitments were respected:

- Promotion of shared value, selecting suppliers who can contribute positively to the economic, social and environmental well-being of the company and the territory.
- Integrated assessment of ESG performance, with particular attention to compliance with environmental requirements, the protection of human rights and working conditions, as well as the adoption of ethical behaviors.
- Preference for local suppliers or suppliers with a lower logistical impact, in order to reduce transport-related emissions and strengthen the link with the local community.
- Adoption of objective and documented criteria in the choice of suppliers, ensuring equal treatment, transparency and traceability of the decision-making process.
- Monitoring of the supply chain, through periodic analyses of active suppliers, including through internal ESG ranking tools and the Code of Conduct.
- Long-term collaboration, with suppliers who demonstrate that they share the company's values, fostering mutual growth and the development of innovative and sustainable solutions.

In addition, the company has given continuity to the work of integration between ESG policies and procurement processes, providing that – all other economic conditions being equal – the choice of the supplier with the best environmental and social performance will be favored. This approach reinforces the positive impact of the purchasing function in achieving the company's sustainability goals and those defined by the 2030 Agenda.

9.2. Monitoring Data / KPIs

Performance KPIs

	TARGET	2023	2024	2024vs2023	2025 H1	2025vs2024
Percentage of suppliers assessed with ESG criteria compared to the total active suppliers.	80% of purchase spend	N/A	N/A	N/A	91	
Suppliers who have signed the Code of Conduct or a declaration of ethical compliance.	60% of all suppliers	N/A	N/A	N/A	62	
Number of employees trained on sustainable purchasing issues.	100%	N/A	N/A	\	100%	

Conclusions:

Significant progress was made in sustainable supply chain management in the first half of 2025. In particular, the target was reached and exceeded with 91% of purchase expenditure covered by suppliers assessed according to ESG criteria, and with 91% of expenditure referring to suppliers who have signed the Code of Conduct or an ethical statement. In addition, 100% training was achieved on sustainable purchasing issues for the staff involved, with a particular focus on the entire purchasing team, who participated in a course specifically dedicated to the sustainability of the supply chain. These results confirm the company's commitment to strengthening its responsible procurement practices, in line with sustainability objectives and ethical governance.

Monitoring data

	2023	2024	2025 H1
Percentage of suppliers with environmental/social certifications (es. ISO 14001, SA8000).	\	\	more than 60%
Number of cases of non-compliance or ethical violations found in the supply chain.	0	0	0



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Conclusions:

During 2025, Icrom has consolidated its commitment to sustainable procurement, developing a series of actions aimed at the active involvement of suppliers and the internal training of its staff. In particular, an awareness campaign was launched for supply chain partners, asking them to fill in the ESG questionnaire, divided into the Environmental, Social, Governance and Health & Safety dimensions, and to sign the Supplier Code of Conduct. This approach has fostered a transparent and constructive dialogue with suppliers, promoting the dissemination of corporate values throughout the supply chain.

At the same time, training sessions dedicated to ICROM Purchasing Department employees were organized, focused on the application of the principles of the ISO 20400 standard on sustainable procurement. Key topics such as human rights, governance, environmental protection and social responsibility were addressed during the trainings, strengthening the team's ability to integrate ESG criteria into the supplier selection and management process. Thanks to these interventions, the organization has been able to increase its awareness and operational consistency, laying the foundations for a more resilient, ethical and responsible procurement model.



ICROM S.r.l - A Company of Proxis Development Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

10. Summary and future objectives

The sustainability path undertaken by Icrom continues with consistency and determination, as demonstrated by the performance recorded in the first six months of 2025. The constant monitoring of the defined KPIs has allowed us to consolidate the results achieved and to identify new areas for improvement. The absence of non-conformities, internal satisfaction levels and the adoption of increasingly responsible practices towards the environment and the community testify to an authentic and shared commitment.

With an eye to the future, the company confirms its commitment to continuous improvement, setting new targets to the KPIs already identified, updating them on the basis of the evidence collected and emerging needs. Particular attention will be paid to ESG training, supply chain traceability and the strengthening of actions to support health and safety in the workplace.

Finally, in 2025 the purchase of 30% of energy from renewable sources and certified as green was launched, a concrete step towards a more sustainable energy transition. This milestone represents an important milestone in the path of reducing Icrom's environmental footprint, in line with global climate goals.

These actions are part of a broader design to align with the global goals for sustainable development. In particular, the analysis of corporate impacts, cross-referenced with the materiality matrix, highlighted alignment with numerous UN SDGs:

- **SDG 3 – Health and well-being:** constant attention to the well-being of workers, safety monitoring and corporate welfare initiatives.
- **SDG 4 – Quality education:** development of ESG training and professional growth of employees.
- **SDG 5 – Gender equality:** promotion of equal opportunities in selection and career development processes.
- **SDG 7 – Clean and accessible energy:** start of the purchase of 30% of certified green energy and use of the photovoltaic system.
- **SDG 8 – Decent work and economic growth:** careful management of turnover, access to growth opportunities and performance evaluation.
- **SDG 9 – Industry, innovation and infrastructure:** investments in more efficient and less impactful production technologies.
- **SDG 10 – Reduce inequalities:** diversity and inclusion initiatives and a focus on equal pay.
- **SDG 12 – Responsible consumption and production:** focus on reducing raw materials and waste.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

- **SDG 13 – Fight against climate change:** measurement of the carbon footprint.
- **SDG 14 – Life below water:** sustainable water management and reduction of the impact on discharges.
- **SDG 16 – Peace, justice and strong institutions:** presence of a code of ethics, whistleblowing and corporate integrity policies.
- **SDG 17 – Partnerships for the goals:** supply chain engagement and collaboration with external stakeholders.

Ennio Schirò
Environment & Sustainability Manager

Dr. Sassi Aline
General Manager

Dr. Morosini Pierfrancesco
C.E.O.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

11. Annexes and references

Annex n°1 Carbon footprint study

Annex n°2 Living wage report



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

ANNEX n°1

Carbon footprint study



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Greenhouse Gas Emissions Technical Report (Scope 1 and Scope 2) January 2022 – December 2024



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Summary

Introduction	4
Definition of scopes 1 and 2.....	5
Calculation methodology.....	7
Calculating the carbon footprint of the site 2022.....	8
Comment on 2022 data (Scope 1 and 2)	10
Site Carbon Footprint Calculation 2023	11
Comment on 2023 data (Scope 1 and 2)	12
Calculating the carbon footprint of the site 2024.....	13
Comment on 2024 data (Scope 1 and 2)	14
Conclusion	15



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Introduction

ICROM recognizes the strategic importance and ethical responsibility of addressing the challenges related to climate change and environmental sustainability. In a global context where the reduction of greenhouse gas emissions is a shared priority at institutional, scientific and industrial level, our company has chosen to embark on a structured path of measurement, monitoring and reporting of its carbon emissions. We firmly believe that only through transparent data, solid methodologies and constant commitment can we plan effective and measurable actions to reduce our environmental impact.

For us, emissions reporting is not just a technical or regulatory requirement, but a key tool for management and continuous improvement. Through this process, ICROM aims to gain an in-depth understanding of the sources and extent of its emissions, identify opportunities for reduction, and invest in long-term solutions that are both environmentally and economically sustainable.

At this stage, our analysis focuses on measuring **Scope 1 emissions**, generated directly by our production and operational activities, and **Scope 2 emissions**, resulting from the consumption of purchased electricity. These are two key categories to build a solid picture of our carbon footprint and initiate targeted reduction actions. Starting next year, we will expand the scope of our reporting to include **Scope 3 emissions**, which are indirect emissions that occur along the entire value chain, such as those from transportation, the procurement of goods and services, and the use of products.

This evolution demonstrates ICROM's determination to align with international best practices in sustainability and to actively contribute to the achievement of global climate change mitigation goals. This report, prepared in accordance with the principles and guidelines of the **Greenhouse Gas Protocol – Corporate Accounting and Reporting Standard**, is therefore an essential tool to ensure transparency, credibility and consistency in our environmental actions.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Definition of scopes 1 and 2

According to the GHG Protocol

The **Greenhouse Gas Protocol (GHG Protocol)**, the most widely used international standard for accounting and reporting greenhouse gas (GHG) emissions, divides organizations' emissions into three main categories: Scope 1, Scope 2, and Scope 3. This section focuses on the first two areas, which form the core of this analysis.

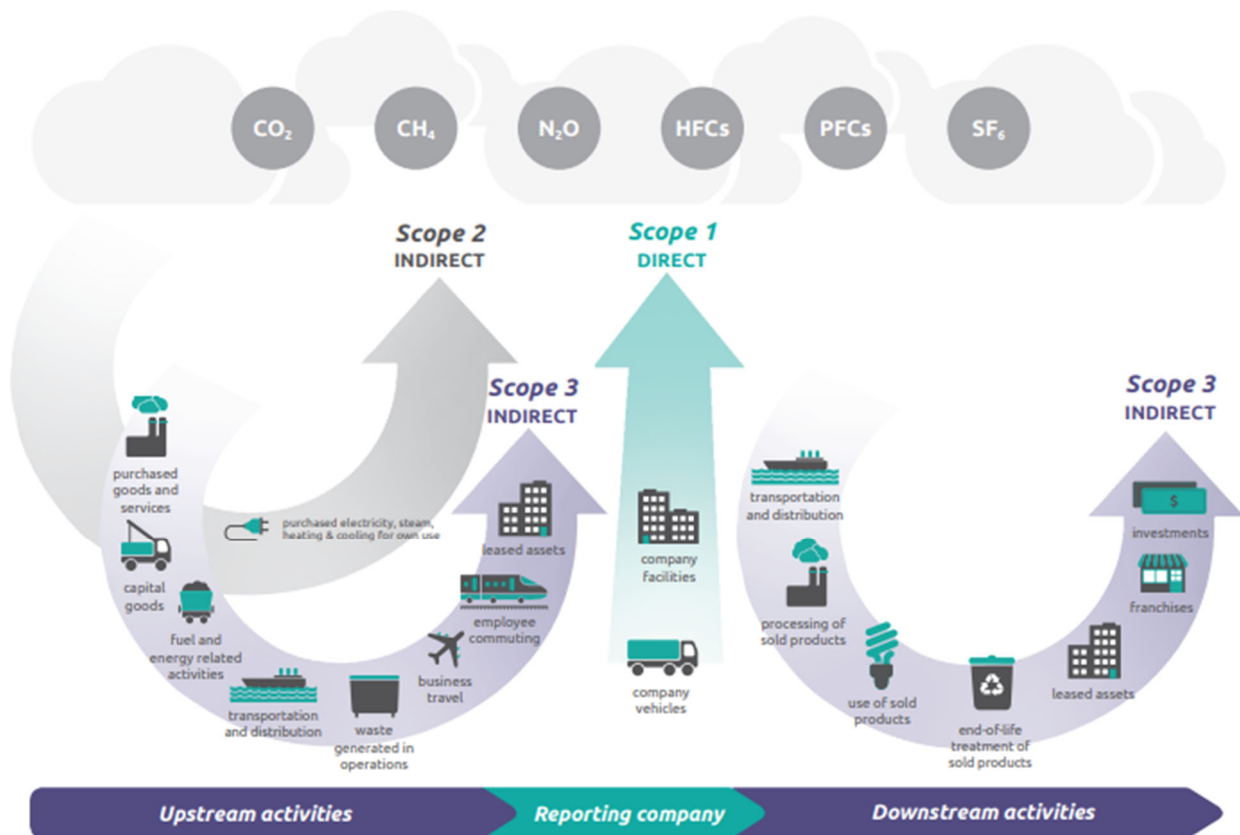
Scope 1 emissions include all direct greenhouse gas emissions from sources owned or directly controlled by the organization. These are the emissions generated directly in the course of business operations. Common examples include burning fossil fuels in boilers, furnaces, or generators located on-site; fuel consumption in company-owned vehicles; emissions deriving from specific industrial processes; and refrigerant leaks from air conditioning or refrigeration systems. These emissions are calculated from consumption data (e.g. litres of diesel, cubic metres of natural gas or kilograms of refrigerant) and converted into tonnes of CO₂ equivalent using appropriate emission factors.

Scope 2 emissions, on the other hand, encompass all indirect emissions associated with the generation of electricity, heat, or steam purchased and consumed by the organization. While these emissions do not physically occur within the company's premises, they are accounted for because they are related to the energy required for business operations. Scope 2 is calculated mainly on the basis of recorded energy consumption (in kWh) and emission factors corresponding to the mix of national electricity production (*location-based*) or specific supply contracts (*market-based*).

The distinction between Scope 1 and Scope 2 is crucial to understand which areas the company can directly and immediately influence and which depend on energy supply choices and the broader transition to renewable energy sources. From a strategic point of view of emissions management, the reduction of Scope 1 involves targeted actions on the efficiency of processes and the replacement of fuels, while the reduction of Scope 2 can be achieved through policies for the purchase of certified renewable energy, investments in self-production from renewable sources (such as photovoltaic systems) and energy efficiency interventions.

In line with the recommendations of the GHG Protocol, this report provides a detailed and separate analysis of ICROM's Scope 1 and Scope 2 emissions, offering a clear and transparent picture of direct and indirect emissions associated with the company's production and operational activities.

Figure [1.1] Overview of GHG Protocol scopes and emissions across the value chain





ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Calculation methodology

In compiling this inventory of the company's carbon footprint, ICROM has adopted the guiding principles set out in the **Greenhouse Gas Protocol**, ensuring that the analysis is rigorous, transparent, and useful for decision-making.

1. **Relevance:** The greenhouse gas emissions considered are those that most accurately represent the environmental impact of our activities, ensuring that the results can effectively guide strategic decisions both internally and for our stakeholders.
2. **Completeness:** all emission sources were included within the defined organisational and operational limits. Any exclusions, where applicable, shall be clearly documented and justified.
3. **Consistency:** We have applied uniform criteria and methodologies to enable data comparison over time and to reliably track progress.
4. **Transparency:** the calculation process, the assumptions used and any estimates or additions to the data are presented in a clear and accessible way, allowing an immediate understanding of the work carried out.
5. **Accuracy:** Estimates have been developed to minimize margins of error and uncertainty, avoiding both underestimation and overestimation, and providing a solid foundation for operational and strategic decision-making.



ICROM S.r.l - A Company of Proxis Developpement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

Calculating the carbon footprint of the site

2022

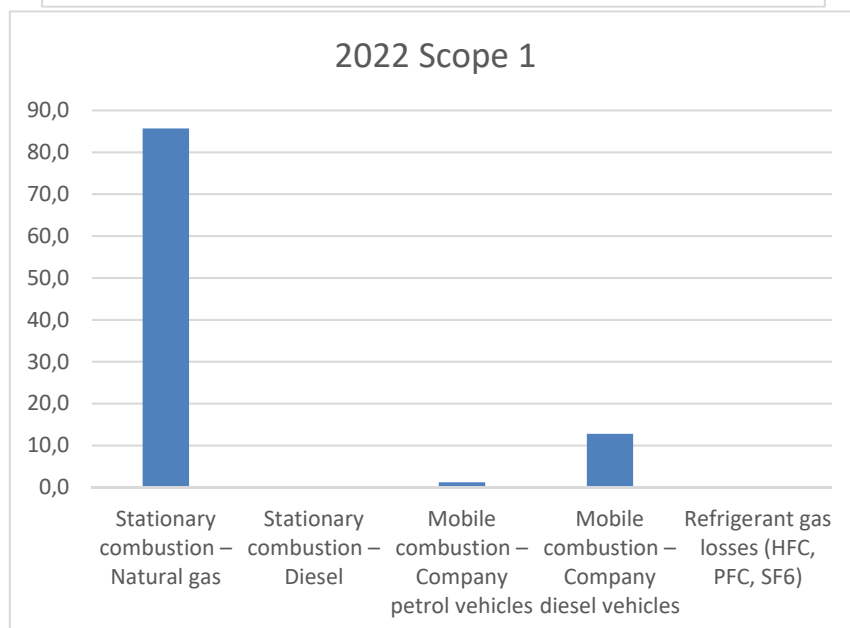
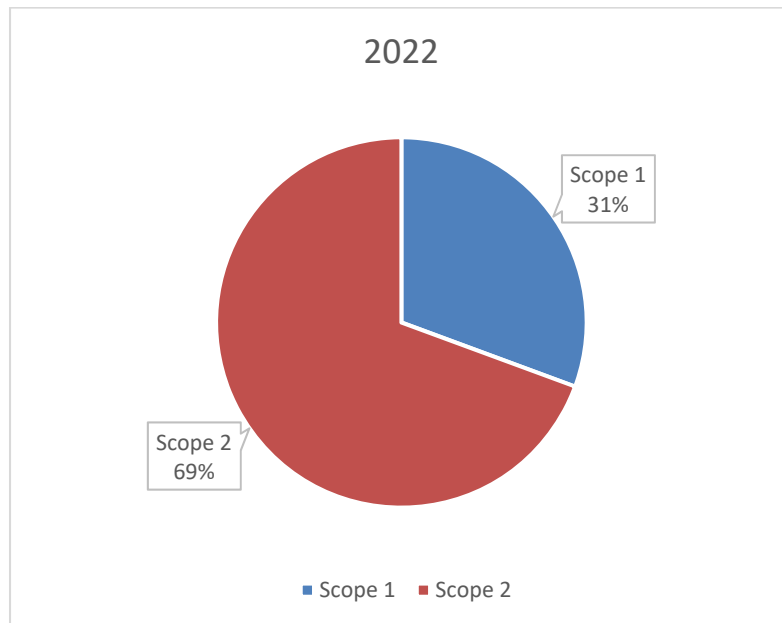
Result

Result				
Emisison Sources	tCO2	% of each area	%	Signal
Scope 1				
Stationary combustion – Natural gas	414,029262	85,7	31	GHG / DEFRA Protocol
Stationary combustion – Diesel	1,3375	0,3		
Mobile combustion vehicles – Company petrol vehicles	5,93574334	1,2		
Mobile combustion – Company diesel vehicles	61,845	12,8		
Refrigerant gas leaks (HFC, PFC, SF6)	0	0,0		
Scope 2				
Purchased electricity (based on location)	1094,565	100%	69	GHG / DEFRA Protocol

2022 Corporate Carbon Footprint Results Table



ICROM S.r.l - A Company of *Proxis Développement Group*
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193





ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Comment on 2022 data (Scope 1 and 2)

The data collected for 2022 show the company's direct (Scope 1) and indirect (Scope 2) emissions, expressed in tons of CO₂ equivalent, calculated according to the GHG Protocol and weighted according to the actual consumption of diesel, methane, gasoline, electricity and other sources. These emissions represent the operational core of the company's carbon footprint.

The analysis shows that Scope 1 emissions derive mainly from the use of fossil fuels, both for corporate mobility and for heat generation. Within this category, the component relating to diesel-powered company vehicles represents a significant share, followed by the consumption of methane for thermal uses.

For Scope 2, emissions are linked to the consumption of electricity purchased from the grid. The calculated amount reflects the average carbon intensity of the national electricity mix, in the absence of electricity purchases certified as coming from renewable sources. It should be noted that the presence of a photovoltaic system on site, while contributing to a reduction in grid electricity consumption, does not completely eliminate emissions in this category, as the calculation of the GHG Protocol requires a distinction to be made between electricity produced internally and that purchased.

The distribution of emissions shows a significant weight of the electrical component on the total, a characteristic often observed in production sites with processes that require a continuous power supply and energy-intensive equipment. The share linked to fuels, although less dominant, still indicates an operational dependence on conventional fossil fuels.

The combination of these two categories provides a clear picture of the main sources of emissions and their respective percentage contributions to the annual total. This level of detail allows emissions to be associated with specific activities or departments, allowing data to be read across the board and placed within a broader operational context.



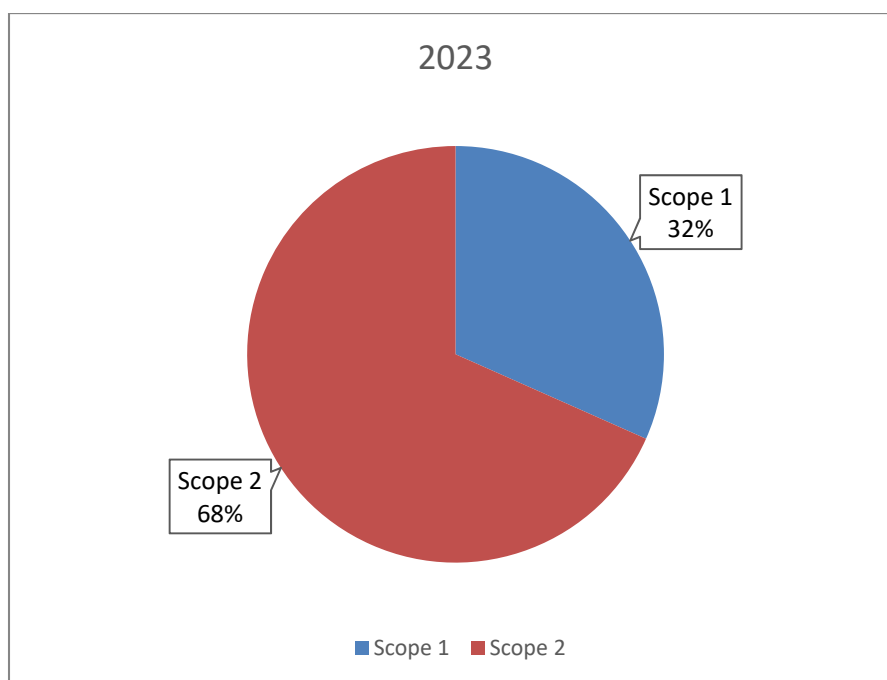
ICROM S.r.l - A Company of Proxis Development Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

Site Carbon Footprint Calculation 2023

Result

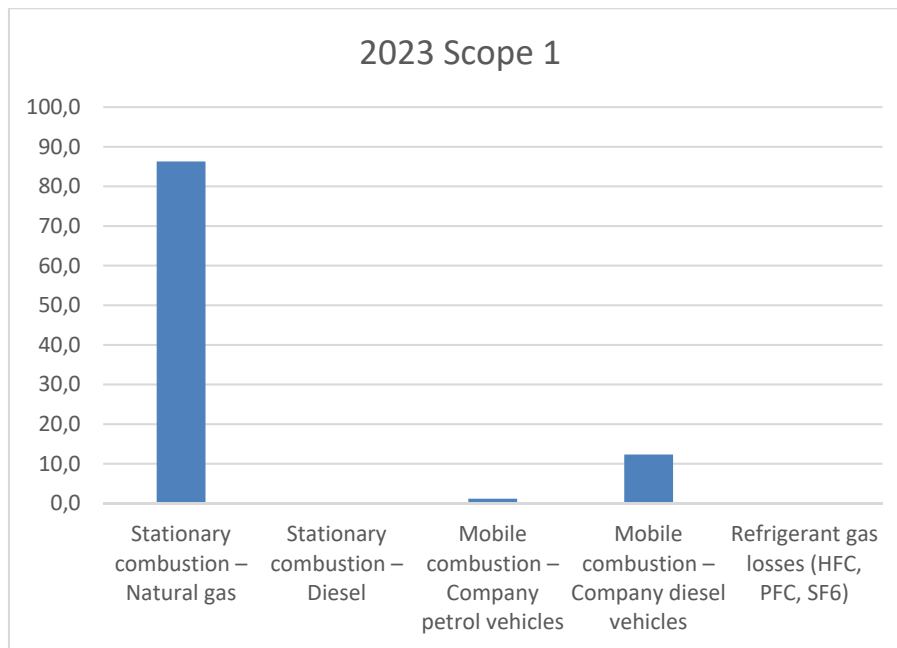
Emisison Sources	tCO2	% of each area	%	Signal
Scope 1				
Stationary combustion – Natural gas	448,010394	86,2	32	GHG / DEFRA Protocol
Stationary combustion – Diesel	1,3375	0,3		
Mobile combustion vehicles – Company petrol vehicles	6,13775487	1,2		
Mobile combustion – Company diesel vehicles	63,949	12,3		
Refrigerant gas leaks (HFC, PFC, SF6)	0	0,0		
Scope 2				
Purchased electricity (based on location)	1122,19	100%	68	GHG / DEFRA Protocol

2023 Corporate Carbon Footprint Results Table





ICROM S.r.l - A Company of *Proxis Développement Group*
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193



Comment on 2023 data (Scope 1 and 2)

Analysis of the 2023 data shows an overall change in the company's carbon footprint compared to the previous year, with variations driven by both direct fuel consumption and the supply of electricity purchased. **Scope 1 emissions**, which are primarily derived from the combustion of natural gas, diesel and gasoline for stationary and mobile uses, reflect operational and seasonal factors, as well as possible changes in production volumes and heating requirements. For **Scope 2**, calculated using the location-based approach, the results are closely linked to the trend in electricity consumption and the intensity of grid emissions.

Overall, 2023 confirms the importance of continuous monitoring of the main sources of emissions and energy efficiency, both to reduce environmental impact and to identify opportunities for optimization. The availability of accurate and consistent data allows the company's emissions baseline to be consolidated, facilitate year-over-year comparison, and lay the groundwork for the future extension of reporting to **Scope 3**, scheduled for the next reporting period.



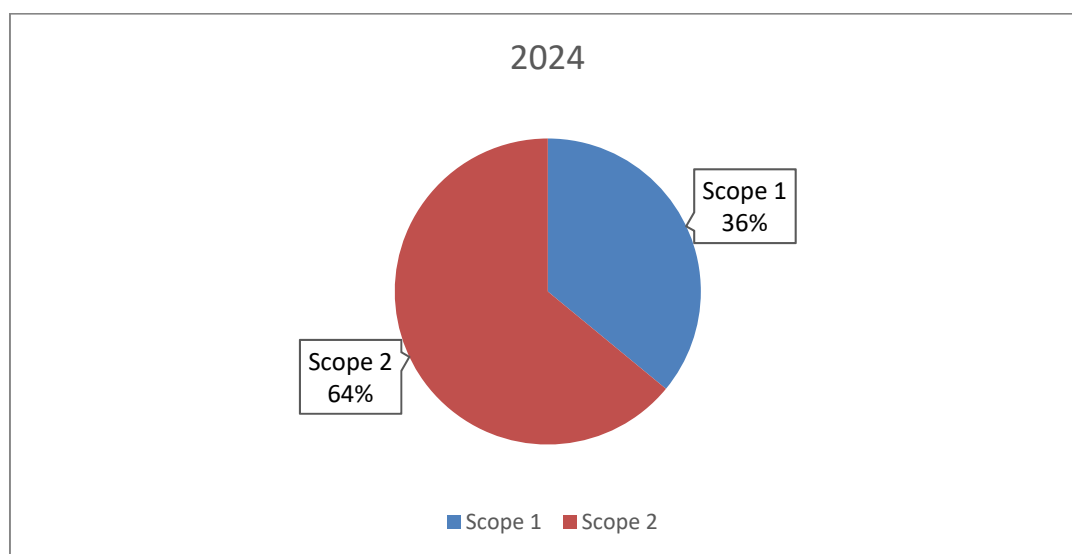
ICROM S.r.l - A Company of Proxis Developpement Group
 Share Capital: € 2,000,000 i.v.
 Registered Office
 Sede Amministrativa e Stabilimento/Headquarters and Plant:
 Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
 Tax Code/VAT number IT00828970152
 R.E.A. 773364
 MECHANOGRAPHIC NO. 365193

Calculating the carbon footprint of the site 2024

Result

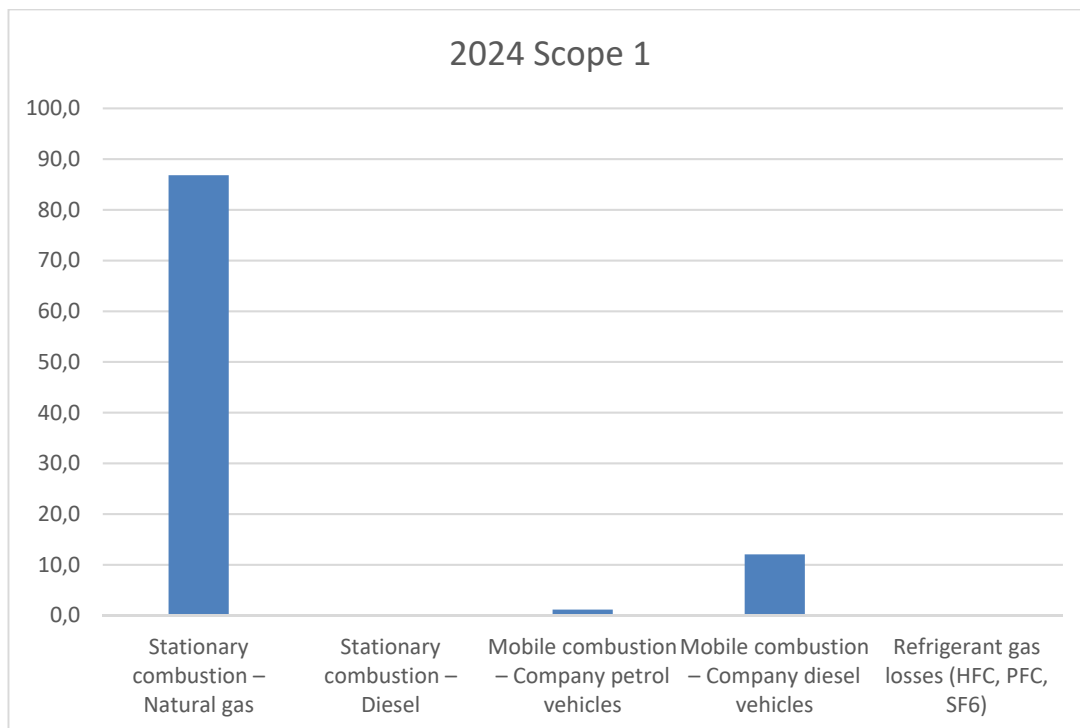
Result	Emisison Sources	tCO2	% of each area	%	Signal
	Scope 1				
	Stationary combustion – Natural gas	494,980284	86,8	36	GHG / DEFRA Protocol
	Stationary combustion – Diesel	0	0,0		
	Mobile combustion vehicles – Company petrol vehicles	6,59045775	1,2		
	Mobile combustion – Company diesel vehicles	68,738	12,1		
	Refrigerant gas leaks (HFC, PFC, SF6)	0	0,0		
	Scope 2				
	Purchased electricity (based on location)	1015,45	100%	64	GHG / DEFRA Protocol

2024 Corporate Carbon Footprint Results Table





ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193



Comment on 2024 data (Scope 1 and 2)

In 2024, the company's emissions analysis benefited from greater integration between data collection and operational planning. Monitoring activities are no longer limited to the simple quantification of tons of CO₂ equivalent, but are beginning to be used as a decision-making tool, allowing the early identification of areas for improvement and possible efficiency measures.

Scope 1 emissions remained substantially in line with historical averages, with changes mainly attributable to the management of fuels for heating systems and corporate mobility. The vehicle fleet and heating systems continue to be the main direct contributors, highlighting the need for targeted actions to gradually reduce their impact.

For **Scope 2**, calculated using the location-based approach, electricity consumption remained stable, with a positive contribution from the company's photovoltaic system. Although it is not directly included in the calculation of emissions, it reduces dependence on the national grid and promotes more sustainable consumption management.

Overall, 2024 confirms the value of a structured approach to measuring the carbon footprint and lays the foundations for the expansion of the reporting perimeter to **Scope 3**, with the aim of achieving an increasingly complete and transparent view of the company's environmental impact.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Conclusion

The analysis of the data relating to the years 2022, 2023 and 2024 highlights a path of increasing maturity in the measurement of the company's carbon footprint. In these three years, the company has consolidated a structured method of data collection and processing, in line with the GHG Protocol, and has gained an increasingly clear understanding of the main sources of direct and indirect emissions.

Scope 1 emissions remained broadly stable, with variations mainly related to seasonality, production volumes and fleet management. The combustion of fossil fuels for plants and vehicles continues to represent the most significant source within this category.

Scope 2 emissions, calculated using the location-based approach, show a trend consistent with annual electricity consumption, partially mitigated by the contribution of the company's photovoltaic system, which, although not directly included in the calculation, reduces the share of energy withdrawn from the national grid.

The analysis of this three-year period has made it possible to identify several strategic priorities:

- Improve the energy efficiency of production processes and equipment.
- Evaluation of solutions for the progressive electrification of the company fleet.
- Increase the use of renewable energy and reduce dependence on fossil fuels.

A specific goal already set for 2025 is to purchase at least 30% of electricity from certified renewable sources, representing a concrete step towards reducing Scope 2 emissions. At the same time, the company intends to extend its reporting to Scope 3, in order to gain a more complete view of its climate footprint and to more effectively target mitigation actions.



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

ANNEX n°2

Living wage report



ICROM S.r.l - A Company of *Proxis Développement Group*
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Summary	
Introduction	3
Icrom's commitment.....	3
Technical analysis: comparison between company wages and living wage in Lombardy	4
Conclusions	5



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Introduction

The concept of *Living Wage* is a fundamental reference for assessing whether a worker's pay is sufficient to guarantee him and his family a dignified life. Unlike the statutory minimum wage, the living wage is not set by law, but is based on independent calculations that consider the real cost of living in a given territory. These calculations include essential items such as food, housing, healthcare, transportation, education, clothing, and a share for unexpected expenses. At the international level, the living wage is recognized as a fundamental tool for the promotion of social justice, the fight against in-work poverty and the enhancement of decent work. In many ESG assessments, SA8000 and sustainability audits, it is considered a strategic parameter, because it directly affects people's quality of life and business ethics. Monitoring compliance with this standard is now a sign of transparency, accountability, and long-term vision. Its conscious adoption reflects the company's desire not only to comply with minimum standards, but to actively promote the well-being of workers and the community.

Icrom's commitment

Icrom S.r.l., a company specialising in the production of active pharmaceutical ingredients, has always placed the value of people at the centre of its business strategy. The organisational culture is based on principles of respect, fairness and social responsibility, which are also reflected in the remuneration policy. Although the living wage is not mandatory by law in Italy, Icrom has chosen to align itself with this principle, recognizing its social and strategic value. In fact, the company considers that every worker should be able to live with dignity thanks to his or her salary, without having to resort to forms of external integration to income from work. This commitment is part of a broader ESG (Environmental, Social & Governance) vision that ICROM is adopting, both on a voluntary basis and in view of future sustainability reporting. The concept of "fair wage" is also consistent with the principles of key international standards on human rights and decent working conditions (including the ILO, the UN Declaration on Human Rights and European due diligence legislation). For these reasons, ICROM has deemed it appropriate to objectively verify its compliance with the living wage using independent and recognized sources.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Technical analysis:

Comparison between company wages and living wage in Lombardy.

According to the WageIndicator Foundation (June 2025), the living wage for a full-time worker in the Lombardy Region is equal to:

- **€7.60 gross/hour** (minimum living wage)
- **€1,316.47 gross/month** (based on 40 hours per week)

A "maximum living wage" of €9.37 gross/hour (€1,624.30 gross/month) is also indicated, which takes into account a higher quality of life. Both values refer to gross and are calculated on a "typical family", according to the WageIndicator methodology. In Icrom, the minimum hourly wage is currently €10.57 gross/hour, which corresponds, with an average IRPEF rate of 12.5%, to a net of about €8.37/hour. On a monthly basis (calculated over 175 working hours), this equates to a net wage of approximately €1,465/month, which is significantly higher than the WageIndicator's estimated living wage threshold for Lombardy, which stands at between €1,200 and €1,300 net/month. This confirms the company's compliance with an international standard of living pay. It follows that the minimum wage paid by Icrom is higher than both the minimum and maximum living wage, according to the official parameters available for the Lombardy Region. This data, verifiable and documented, confirms the company's substantial adherence to the criteria of equity and social sustainability.



ICROM S.r.l - A Company of Proxis Développement Group
Share Capital: € 2,000,000 i.v.
Registered Office
Sede Amministrativa e Stabilimento/Headquarters and Plant:
Via Delle Arti, 33 - 20863 Concorezzo (MB) – Italy
Tax Code/VAT number IT00828970152
R.E.A. 773364
MECHANOGRAPHIC NO. 365193

Conclusions

From the analysis carried out, it is clear that Icrom guarantees a fair and decent wage to its workers, higher than the minimum levels required for a dignified life as estimated by independent and internationally recognized sources. The company's hourly wage is higher not only than the minimum value, but also the maximum range of the subsistence range published by WageIndicator for Lombardy. This means that Icrom positions itself as a conscious, responsible reality that already complies with one of the most sensitive standards of the current landscape ESG. In an economic context in which poor work is still a widespread reality, especially in low-wage sectors, the fact that Icrom has adopted wage levels above minimum standards represents a voluntary choice of ethical value, as well as a competitive strength. Living wage compliance is not just a social requirement, but a tool to attract and retain talent, improve the corporate climate and respond to the demands of increasingly sustainability-conscious stakeholders. For the future, the company intends to maintain and strengthen this approach, monitoring updates to the living wage annually and integrating these parameters into its welfare and pay transparency policies. This commitment will also be made visible in ESG reporting documents.