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radiant *comfort* systems

Certified



Public Affairs & Advocacy



Scope:

Eurotherm SpA SB and Eurotherm CS s.r.o. (hereinafter, jointly, "Eurotherm").

Version: 1.0

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Approved by: Board of Directors and Leadership Team

Scheduled review: annual or in case of regulatory changes or significant organizational changes.

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1. Introduction

Eurotherm was founded in Trentino-Alto Adige with the aim of creating spaces where people feel good, developing and spreading technologies for indoor comfort and energy efficiency, with attention to caring for the environment and communities ("Feel Good Inside, Care Outside").

Eurotherm operates in a sector (radiant systems and solutions for indoor well-being, temperature control and technical support for systems) characterized by continuous regulatory evolution and a significant impact on resources and emissions throughout the construction supply chain. In this context, dialogue with institutions, regulators and stakeholders is an integral part of a responsible approach to market transformation.

Eurotherm SpA SB is a certified B Corp and Benefit Corporation: these choices strengthen the commitment to integrate common benefit objectives into strategy and governance, and to make our practices measurable and verifiable. Eurotherm also participates in initiatives and networks that promote climate action (e.g. co2alizione), positive impact business models (e.g. B Corp Community) and industry forums (e.g. QRAD, the radiant consortium in Italy), in compliance with the principles of transparency and integrity.

This Policy is adopted with reference only to the companies indicated in the scope and governs the interest representation activities carried out by Eurotherm directly or through authorized third parties, without prejudice to the autonomy and responsibilities of each company.

2. Purpose

This Policy defines principles, rules and safeguards to ensure that the activities through which Eurotherm engages with institutions and contributes to public decision-making processes are carried out in a responsible, legitimate, transparent and traceable manner. Included in this scope are public affairs and institutional relations activities, participation in public consultations, preparation and sharing of technical contributions in regulatory processes, as well as Eurotherm's presence in trade associations, consortia and working groups. The Policy also applies to interactions with representatives of the Public Administration (at local, national and European level) and with persons entrusted with public service, according to the definitions of the applicable legislation.

The purpose is twofold: on the one hand, to enhance the contribution of expertise that Eurotherm can offer to make policies more effective and technically sound; on the other, to prevent risks of conflicts of interest, undue influence, corruption or lack of transparency, ensuring consistency between the positions taken (directly or through third parties) and Eurotherm's values, including common benefit objectives and ESG commitments. The Policy also clarifies roles and responsibilities, authorization criteria, control safeguards and reporting channels.

3. Recipients and scope of application

This Policy applies to directors, managers and employees of Eurotherm SpA SB and Eurotherm CS s.r.o. and, more generally, to anyone acting in the name and/or on behalf of Eurotherm, regardless of contractual form: collaborators, consultants, agents, intermediaries and professionals who carry out public affairs activities or who participate in meetings and initiatives with institutional counterparts.

The Policy covers both activities carried out directly by Eurotherm personnel and those carried out indirectly through associations, consortia, coalitions, chambers of commerce, think tanks, professional firms or other intermediaries. When

Eurotherm participates in joint initiatives (for example in associations or advocacy projects), this Policy applies to people and activities attributable to Eurotherm and, where appropriate, may also be referenced in contractual relationships with partners and third parties.

4. Definitions (essential glossary)

In this Policy, “lobbying” or “public affairs” means the activity of representing interests to public decision-makers aimed at legitimately contributing to the formation of rules, policies or decisions. “Advocacy” refers to initiatives through which Eurotherm promotes topics of collective interest consistent with its mission and sustainability commitments, such as energy transition, decarbonization of buildings, indoor air quality and well-being in environments.

References to Public Administration, Public Official or person entrusted with public service are to be understood according to the definitions provided by the applicable legislation in the countries where Eurotherm operates. “Associations and organizations” means, by way of example, trade bodies, consortia and coalitions to which Eurotherm belongs or in which it participates, such as QRAD and co2alizione and through the B Corp Community.

5. Guiding principles

Eurotherm carries out lobbying and public affairs activities exclusively to contribute positively to society and/or the environment, promoting energy efficiency, decarbonization of buildings and indoor well-being. Eurotherm will not support positions aimed at weakening environmental, social, health and safety or good governance protections.

Eurotherm's positions and technical contributions are based on reliable data and, where relevant, on scientific evidence and verifiable sources. Eurotherm documents and retains the main sources supporting the contributions shared.

Eurotherm's actions towards institutions and public stakeholders are always guided by legality and integrity. This means complying with applicable laws and regulations (including those on anti-corruption, transparency, personal data protection and competition) and adopting a zero-tolerance approach to corruption and to any practice that may even appear as undue pressure or promise of advantages.

Eurotherm operates with transparency and traceability. When interacting with public decision-makers or participating in consultations, Eurotherm presents itself clearly, indicating whom it represents and for what purpose, and keeps internal records of the main activities carried out and materials shared.

Eurotherm considers content accuracy essential. Technical positions must be based on real evidence and expertise, communicated in a complete and non-misleading manner. If material errors emerge in information already shared, Eurotherm undertakes to correct them promptly using appropriate methods.

Eurotherm ensures consistency between what it declares and what it supports in public contexts. As a Benefit Corporation and, for Eurotherm SpA SB, a certified B Corp, Eurotherm verifies that the positions it supports, including through associations, are compatible with the purposes of common benefit and ESG objectives.

Eurotherm promotes respectful and solution-oriented dialogue, recognizing the legitimacy of different points of view and contributing to the democratic process with open and responsible dialogue. At the same time, Eurotherm protects fair competition: in industry contexts, sensitive commercial information must not be exchanged nor behaviors discussed or agreed upon that could limit competition.

6. Operating rules

Eurotherm defines roles, responsibilities, and internal controls to ensure that public affairs activities are consistent, controlled, and traceable. Eurotherm identifies an Owner of this Policy and a function for coordinating public affairs activities (hereinafter, "PA Function"). Institutional interactions considered significant (for example, meetings with ministries, authorities or administrations, contributions to public consultations, hearings, position papers, and technical documents intended for public decision-makers) must be evaluated and authorized in advance according to internal delegations, and subsequently documented and archived.

In relations with Public Administration and equivalent entities, Eurotherm does not seek or establish relationships of favor, influence, or interference aimed at obtaining undue advantages. It is always forbidden to offer, promise, authorize, or provide payments, gifts, hospitality, benefits, or favors – even indirect – that could be interpreted as intended to influence a decision. It is likewise forbidden to exert improper pressure, request procedural shortcuts, or ask for confidential information.

Eurotherm requires that every institutional contact takes place in a transparent and professional manner: those representing Eurotherm must clarify their role and the purpose of the interaction, adhere to required protocols (including any registers or access rules), and share correct and supportable information.

Regarding gifts, hospitality, and representation expenses, Eurotherm requires particular caution when the counterparts are related to the Public Administration. Such expenses are allowed only if they comply with internal procedures and applicable regulations and, in any case, must never be used to create expectations of reciprocity or undue advantages. Donations and sponsorships must be authorized, justified, and traceable, with clear identification of the counterparts and management through official financial channels.

Eurotherm does not make direct or indirect contributions to political parties, candidates, or election campaigns, except as may be permitted by law and decided according to any specific internal rules that ensure full transparency and control.

Political contributions, including those in kind, are understood to mean, by way of example: goods or services provided to parties/candidates/campaigns, use of company premises, making personnel available during working hours, free professional services, sponsorships, or other benefits with a political purpose. Such contributions are prohibited. If local law allows exceptions, these are possible only after Legal/Compliance assessment, formal approval by the Board of Directors, and registration/transparency according to internal procedures.

Participation in associations, consortia, and coalitions (for example QRAD, co2alizione, B Corp Community) is considered a tool to contribute to the responsible development of the sector. Eurotherm assesses, before joining and periodically, the alignment of such organizations with values, mission, and ESG objectives, as well as their transparency and potential reputational and competition risks. If significant misalignments emerge, Eurotherm initiates a discussion and evaluates consequent actions, which may include dissociation from specific positions or, in more significant cases, withdrawal.

When Eurotherm uses consultants, intermediaries, or external professionals for public affairs activities, engagement is allowed only after reputational and compliance checks and with a contract that defines permitted activities, ethical standards, and reporting obligations. Third parties must comply with this Policy and other applicable Eurotherm policies.

Public positions on regulatory issues must be coordinated among the competent functions (for example PA Function, Legal, Sustainability, and Communication) to ensure consistency, accuracy, and robustness of evidence. Eurotherm also pays attention to avoiding potentially misleading or unsupported communications, including risks of greenwashing.

7. Advocacy

Eurotherm carries out advocacy activities on issues of collective interest consistent with its mission and sustainability commitments, contributing to the improvement of indoor well-being and the energy transition of the built environment. In this context, Eurotherm may participate in working groups and initiatives with institutions and stakeholders to promote policies and technical standards that foster energy efficiency, decarbonization, and quality of environments.

Every advocacy initiative must have clear objectives, identified stakeholders, and verifiable content. Eurotherm assesses in advance the consistency of the initiative with ESG commitments and documents the outcomes, retaining shared materials and contributions.

7bis. Governance, responsibilities and risk management

Accountability and enforcement: the CEO ensures the application of this Policy. The PA Function is responsible for the operational coordination of public affairs and advocacy activities and for maintaining the internal register. The Legal/Compliance function supports compliance checks. The Board of Directors supervises the overall effectiveness of the oversight and formally approves the Policy and its updates at least annually.

Integration in practice: Eurotherm implements the Policy through (i) prior authorization processes for significant institutional interactions, (ii) traceability and archiving of shared materials, (iii) contractual clauses and due diligence on intermediaries and consultants, (iv) periodic training and internal communication of the rules.

Risk identification and monitoring: at least annually, the PA Function, with the support of Legal/Compliance, carries out an assessment of non-compliance risks (e.g. counterparts, country, engagement methods, use of intermediaries, events/hospitality, public consultations) and defines any corrective actions.

Compliance assessment: at least annually, Legal/Compliance checks, also by sampling, the correct application of authorizations, the completeness of the register, and the compliance of third-party engagements; the results and any remediation actions are shared with the Leadership Team and reported to the Board of Directors.

Reporting and complaints procedures: employees, partners, and other stakeholders may raise concerns or report potential violations through whistleblowing channels and the complaints management procedure adopted by Eurotherm. Eurotherm guarantees confidentiality and protection from retaliation, within the limits and as provided by applicable law.

8. Training and awareness

Eurotherm ensures that people who, by role, participate in institutional activities or represent Eurotherm in associative contexts receive periodic training on the principles of this Policy. The training specifically includes anti-corruption measures, management of conflicts of interest, transparency and traceability of interactions, as well as antitrust rules to be observed in industry contexts.

9. Controls, monitoring and reporting

Eurotherm maintains an adequate level of control and monitoring of public affairs and advocacy activities. The PA Function (or other designated function) maintains an internal register of the main activities carried out, in compliance with applicable regulations and the protection of personal data. At least annually, the Owner of the Policy reviews the adequacy of the document, the activities carried out, any critical issues that have emerged, and the alignment of Eurotherm's participation in associations, consortia, and coalitions.

10. Reporting (whistleblowing) and protection from retaliation

Eurotherm encourages the reporting of behaviors potentially contrary to this Policy or applicable laws. Employees and third parties may use the reporting channels provided by Eurotherm. Reports are handled diligently and confidentially, and Eurotherm protects whistleblowers from retaliation, within the limits and as provided by applicable law.

11. Disciplinary measures and consequences

Compliance with this Policy is an integral part of the contractual and professional obligations of the recipients. Any violations are assessed according to criteria of proportionality and in compliance with applicable laws and contracts, and may result in disciplinary measures against employees, as well as termination or withdrawal from contractual relationships with third parties. In cases provided for by law or deemed necessary, Eurotherm may also proceed with reports to the competent authorities.

12. References and related documents

This Policy should be read in conjunction with the applicable internal documents of Eurotherm, including: code of ethics; organizational model pursuant to Legislative Decree. Legislative Decree 231/2001; integrated policy; supplier code of conduct; whistleblowing procedures; responsible marketing and public relations policy.

Date

Christian Pezzei, CEO

DocuSigned by:

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sustainability and
comfort lies our
smart radiant system.

eurotherm[®]
radiant *comfort* systems



Eurotherm SpA Benefit Corporation

Pillhof 91 – 39057 Frangarto (BZ)

T +39 0471 63 55 00

mail@eurotherm.info

www.eurotherm.info

