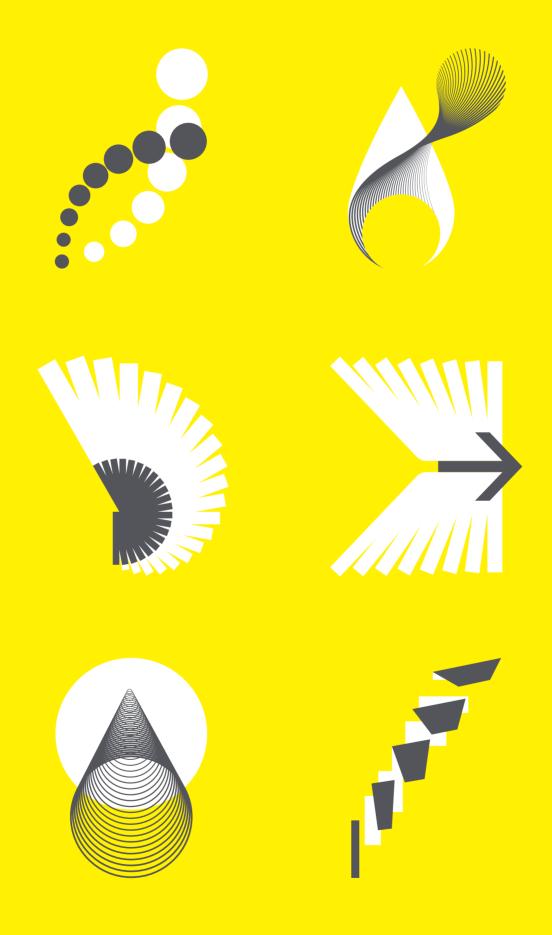
2018 Annual Report





2018 Annual Report

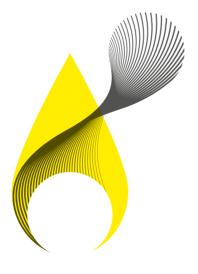




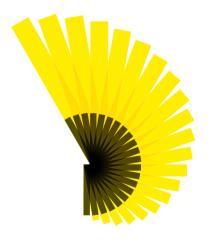
Creative concept







Positioned for change

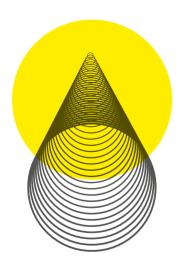


Expanding the range

Practical, almost artistic minimalism, to achieve clarity and understanding of the data by using just two colours for the entire work.

Inside, the concepts' abstract representations express Sabaf's personality – figures that blend, transform, break the patterns enhanced by the two-tone essentiality and the combination of unique materials.

All Creative Agency







Overcoming limits



Adapting to change



INDEX

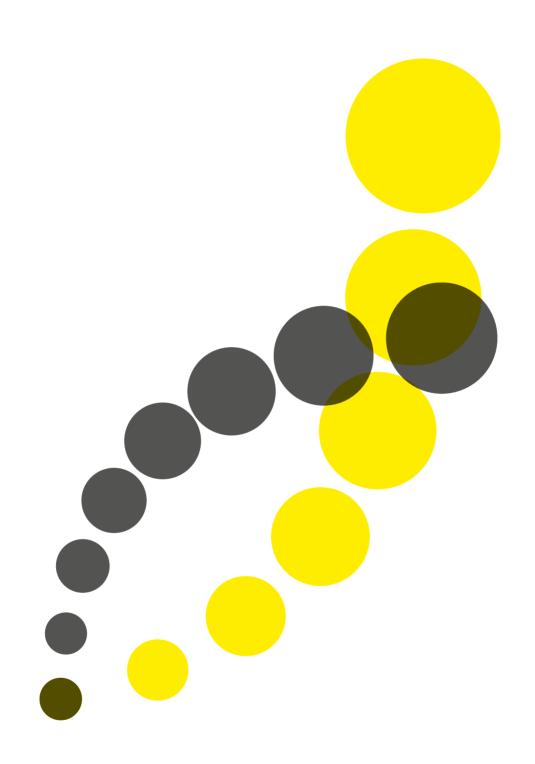
INTRODUCTION TO THE ANNUAL REPORT	10
Key performance indicators in summary (KPI)	12
Products and markets	18
CONSOLIDATED DISCLOSURE OF NON-FINANCIAL INFORMATION	26
Methodological note	27
Letter from the Chief Executive Officer to stakeholders	28
Business model, strategic approach and sustainable creation of value	30
Strategic approach and creation of value	30
Sustainable value creation	30
Values, vision and mission	30
Business model	33
Materiality analysis	42
Corporate Governance, Risk Management and Compliance	44
Corporate Governance	44
Risk Management	57
Compliance	59
Sabaf and employees	62
Risks	62
Personnel management policy	62
The people of the Sabaf Group	63
Recruitment policy	66
Personnel training	70
Internal Communication	70
Diversity and equal opportunities	71
Working hours and hours of absence	72
Remuneration, incentive and enhancement systemsssems	73

Industrial relations	Occupational health and safety and working environment	76
Disciplinary measures and disputes	Industrial relations	80
Sabaf and environment 84 Risks 84 Health and safety, environmental and energy policy 84 Environmental impact 85 Environmental investments 89 Disputes 89 Sabaf, the management of product quality and customer relations 90 Risks 90 Quality management policy 90 Sabaf and supply chain management 92 Supply chain management policy 92 Supply chain management policy 92 Sabaf, Public Administration and Community 94 Sabaf and shareholders 95 Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Business climate analysis	81
Risks	Disciplinary measures and disputes	83
Health and safety, environmental and energy policy	Sabaf and environment	84
Environmental impact	Risks	84
Environmental investments	Health and safety, environmental and energy policy	84
Disputes	Environmental impact	85
Sabaf, the management of product quality and customer relations	Environmental investments	89
Risks 90 Quality management policy 99 Sabaf and supply chain management 92 Risks 92 Supply chain management policy 99 Sabaf, Public Administration and Community 94 Sabaf and shareholders 95 Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Disputes	89
Quality management policy	Sabaf, the management of product quality and customer relations	90
Sabaf and supply chain management 92 Risks 92 Supply chain management policy 92 Sabaf, Public Administration and Community 94 Sabaf and shareholders 95 Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Risks	90
Risks	Quality management policy	90
Supply chain management policy	Sabaf and supply chain management	92
Sabaf, Public Administration and Community 94 Sabaf and shareholders 95 Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Risks	92
Sabaf and shareholders 95 Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Supply chain management policy	92
Sabaf and lenders 97 Sabaf and competitors 97 REPORT ON OPERATIONS 108 CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018 120 SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018 164	Sabaf, Public Administration and Community	94
Sabaf and competitors	Sabaf and shareholders	95
REPORT ON OPERATIONS	Sabaf and lenders	97
CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018	Sabaf and competitors	97
CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018		
SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018	REPORT ON OPERATIONS	108
	CONSOLIDATED FINANCIAL STATEMENTS AT 31 DECEMBER 2018	120
REPORT ON REMUNERATION214	SEPARATE FINANCIAL STATEMENTS AT 31 DECEMBER 2018	164
	REPORT ON REMUNERATION	214



Flexibility and dynamism

Flexibility and dynamism are Sabaf's two great qualities. It means reacting to market variables and events quickly and efficiently, adapting to the changing operating environment.



Introduction to the Annual Report

Key performance indic	ators in summary (KPI)1	2
Products and markets		8

The publication of the Annual Report of the Sabaf Group, now in its fourteenth edition, confirms the Group's commitment, undertaken since 2005, to an integrated reporting of its economic, social, and environmental performance.

One of the first international-level companies to embrace the trend of integrated reporting, Sabaf intends to continue on the path it has undertaken, inspired by the recommendations contained in the international Framework on sustainability reporting of the International Integrated Reporting Council (IIRC), aware that integrated, complete, and transparent reporting can benefit both the companies themselves, through better understanding of the articulation of strategy and greater internal cohesion, and the community of investors, who will more clearly grasp the linkage between strategy, governance, and corporate performance.

The Annual Report provides an overview of the Group's business model and the process of creating corporate value. The Business Model and the main results achieved (Summary Key Performance Indicators) are presented from the perspective of capital used (financial, social and relational, human, intellectual, infrastructural and natural) to create value over time, generating results for the business, with positive impacts on the community and stakeholders as a whole. The "non-financial indicators" include the results achieved in managing and exploiting intangible assets, the main driver that allows the corporate strategy's ability to create value in a perspective of medium to long-term sustainability to be monitored.

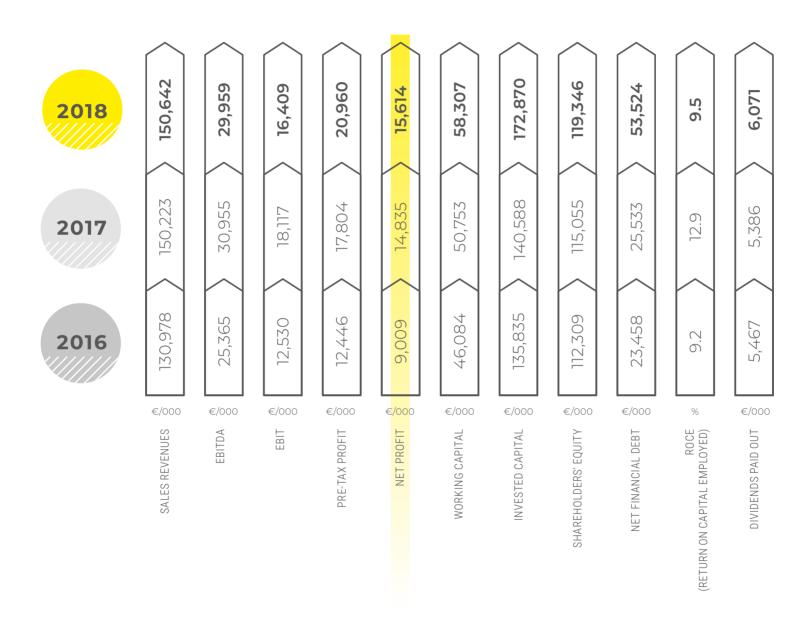
Sabaf also adopts a virtuous approach with regard to compliance with the new regulatory obligations on non-financial reporting. On 30 December 2016, Legislative Decree 254 came into force, which, in implementation of Directive 2014/95/EU on Non-financial and diversity information, requires relevant

public interest entities (EIPRs) to communicate non-financial and diversity information starting with the 2017 financial statements. As a public-interest entity, Sabaf prepared for the second year the consolidated disclosure of non-financial information presenting the chief policies practiced by the company, the management models, the risks, the activities performed by the Group during 2018, and the related performance indicators as pertains to the issues expressly referred to by Legislative Decree no. 254/2016 (environmental, social, personnel-related, respect for human rights, struggle against corruption) and to the extent needed to ensure understanding of the company's activity, its trend, its results, and the impacts it produces.

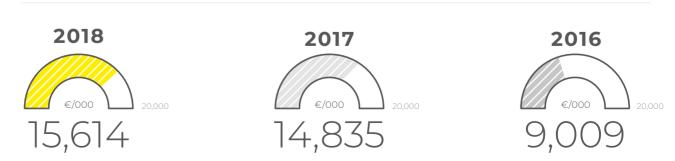
The Group's commitment was also confirmed by the "Oscar di Bilancio" award for the fourth time (previously in 2004, 2013 and 2017), a historic contest promoted and organised by the Italian Public Relations Federation (FERPI), which for over fifty years has been awarding prizes to the most virtuous businesses in financial reporting and in dealing with all stakeholders. In the 2018 edition, Sabaf won the Oscar in the category of Small Listed Companies on the grounds of "having created financial statements that stand out for their ability to effectively and comprehensively represent the economic data of the company's performance together with a description of the company's programme and philosophy. The initial dashboard is extremely effective and guides the reading of the document allowing you to understand the information in a concise and clear way, thanks to the help of graphs and tables for the aggregation of economic and non-economic data. The presence of tables comparing data over a three-year period is also important: it reinforces the understanding of company data and its trend. The decision to direct the graphics of the document towards the concept of "growth" that accompanies the reading of the concept represented in the company data is innovative and original".

Key performance indicators in summary (KPI)¹

ECONOMIC CAPITAL



NET PROFIT

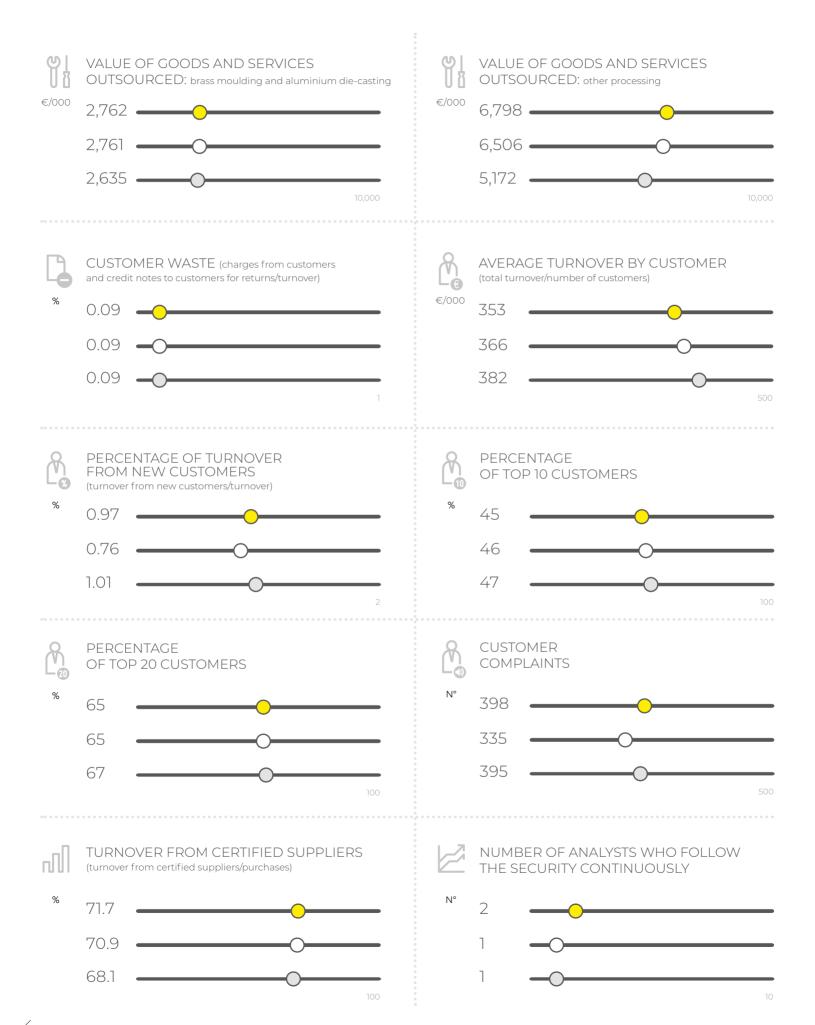


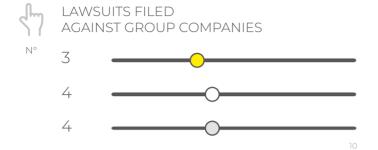
¹ In September 2018, Okida joined the Sabaf Group. The KPIs listed in this section include Okida only for data relating to economic capital

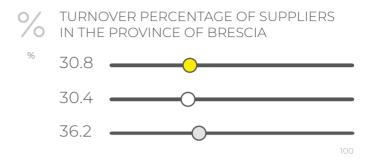
HUMAN CAPITAL

	Å	â	<u> </u>	
	AVERAGE AGE OF PERSONNEL (sum of employee age/total	LEVEL OF EDUCATION (number of graduates/	LEAVING TURNOVER (employees resigned and	HOURS OF TRAINING PER EMPLOYEE (hours of training/
	employees at 31/12) YEARS	total employees at 31/12)	dismissed/total employees at 31/12) % 8	average employees)
2018	39.7	59.6	11.1 9.1	22.3
2017	39.0	57.3	13.3 10.4	19.8
2016	38.6	57.2	15.4 8.5	15.7
		ı	ı	ı
	€	< ^m 7	∂ ♀	(2)
	INVESTMENTS IN TRAINING/ TURNOVER	HOURS OF STRIKE FOR INTERNAL CAUSES	TOTAL EMPLOYEES	ILLNESS RATE (hours of illness/total hours worked)
	%	N°	N° %8 %9	
2018	0.33	0	760 66.6 33.4	2.76
2017	0.28	0	756 65.6 34.4	2.50
2016	0.23	0	736 65.5 34.5	3.28
	\times	××	<u> </u>	
	INJURY FREQUENCY RATE (number of injuries	INJURY LOST DAY RATE (days of absence (excluding injuries while travelling to/from work)	JOBS CREATED (lost)	
	(excluding injuries while travelling to/from work) x 1,000,000/ total hours worked)	x 1,000/total hours worked)	N°	
2018	23.49	0.17	4	
2017	14.68	0.13	2	
2016	9.21	0.04	-23	

RELATIONAL CAPITAL







(ey

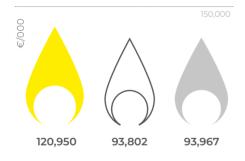




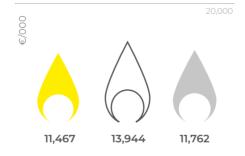


PRODUCTIVE CAPITAL

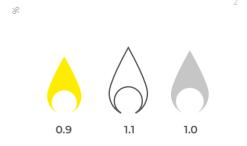
FIXED ASSETS



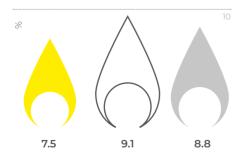
TOTAL NET INVESTMENTS



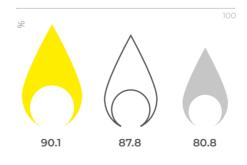
IT BUDGET (investments + current expenditure) / TURNOVER



REAL INVESTMENT/ TURNOVER



QUANTITIES SOLD OF LIGHT ALLOY VALVES ON TOTAL VALVES AND THERMOSTATS



QUANTITIES SOLD OF HIGH ENERGY EFFICIENCY BURNERS ON TOTAL BURNERS

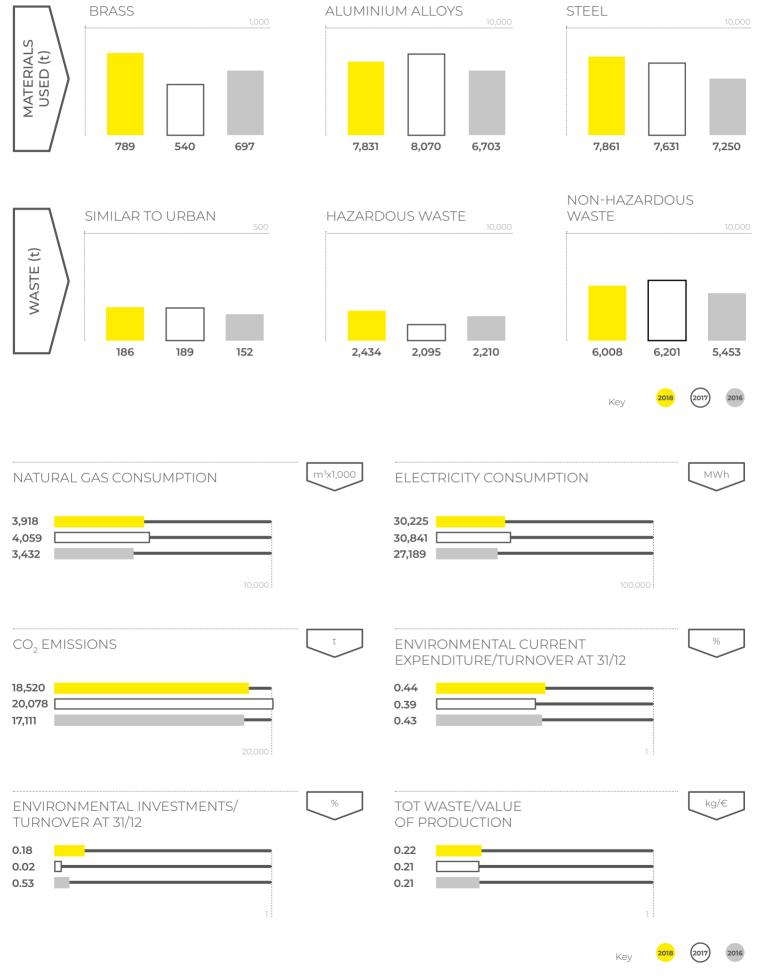
21.9 19.7 14.5







ENVIRONMENTAL CAPITAL



INTELLECTUAL CAPITAL

		2018	2017	2016
Z	CAPITALISED INVESTMENTS IN RESEARCH AND DEVELOPMENT €/000	340	337	231
\Diamond	HOURS DEDICATED TO THE DEVELOPMENT OF NEW PRODUCTS/HOURS WORKED	1.3	1.4	1.5
(0)	HOURS DEDICATED TO PROCESS ENGINEERING/HOURS WORKED (hours dedicated to orders for the construction of new machines for new products or to increase production capacity/total hours worked)	2.5	2.5	2.3
	INVESTMENTS IN INTANGIBLE ASSETS/TURNOVER **	0.4	0.6	0.4
€	CURRENT EXPENDITURE % ON QUALITY/TURNOVER	0.17	0.20	0.24
+	INVESTMENTS % ON QUALITY/TURNOVER	0.06	0.12	0.10
	VALUES OF WASTE/TURNOVER % (production waste/turnover)	0.60	0.74	0.87
	IMPACT OF QUALITY COSTS/TURNOVER % (production waste + charges and returns from customers/turnover)	0.69	0.83	0.96
	NUMBER OF SAMPLES N° FOR CUSTOMERS	1,244	1,245	1,154
	NUMBER OF CODES PROVIDED TO THE FIRST 10 CUSTOMERS	1,939	1,620	2,303

Products and markets

Historically, the Sabaf Group is one of the world's leading manufacturers of components for household gas cooking appliances, with a market share of about 40% in Europe and over 10% worldwide.

In recent years, the Group expanded its product range to include hinges for various types of household appliances (ovens, dishwashers and washing machines) and, with the acquisition of Okida in September 2018, electronic components (electronic control boards, timers, display units and power units for ovens, hoods, refrigerators, freezers and vacuum cleaners).

The range of hinges and burners also includes products for the professional sector

The reference market is represented by manufacturers of household appliances and in particular of kitchens, hobs and ovens. Most of sales are made by the supply of original equipment, while sales of spare parts are negligible.

The 2018-2022 Business Plan

The underlying objective of the Plan is to undertake a renewed path of growth, both organic and through acquisitions: an acquisition policy that can also increase the product range in sectors adjacent to the current ones, taking full advantage of the potential of the Sabaf Group.

As a whole, the Business Plan defines a revenue target ranging from € 250 to € 300 million, accompanied by a gross profitability (EBITDA%) of more than 20% and supported by an investment plan of up to € 230 million.

With regard to the organic component, the Plan set an annual growth target for revenue ranging from 4% to 6%, with the aim of achieving a turnover target of € 180-200 million in 2022.

The Group also assesses growth opportunities through acquisitions, which, based on the objectives of the Business Plan, could generate additional revenues ranging from \notin 70 to \notin 100 million at the end of the five-year period.

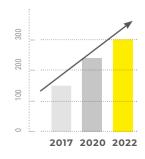




TOP-LINE GROWTH FROM

65% TO 100%

(IN 2022 COMPARED TO 2017)



The product range

Burners

These are the components that, by mixing the gas with air and burning the gases used, produce one or more flame rings.

Accessories

The Group also produces and markets a wide range of accessories, which integrate the offer of the main product lines.

Valves and thermostats

These are the components that regulate the flow of gas to the covered (of the oven or grill) or uncovered burners; the thermostats are characterised by the presence of a thermoregulator to keep the chosen temperature constant.

Hinge

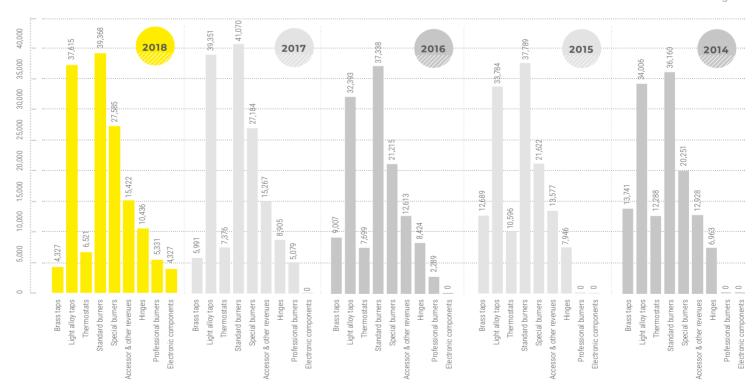
These are the components that allow movement and balancing when opening and closing the oven door, washing machine door or dishwasher door.

Electronic components

These are components such as electronic control boards, timers and display and power units for ovens, refrigerators, freezers, hoods and other products.

SALES BY PRODUCT FAMILY

Mgl €



Sales of light alloy valves have now almost completely replaced brass valves. Continuous improvements in the production process allowed competitiveness to be further enhanced.

In recent years, sales of thermostats have been affected by a physiological drop in their use in ovens and by the difficulties of the main end market (North Africa).

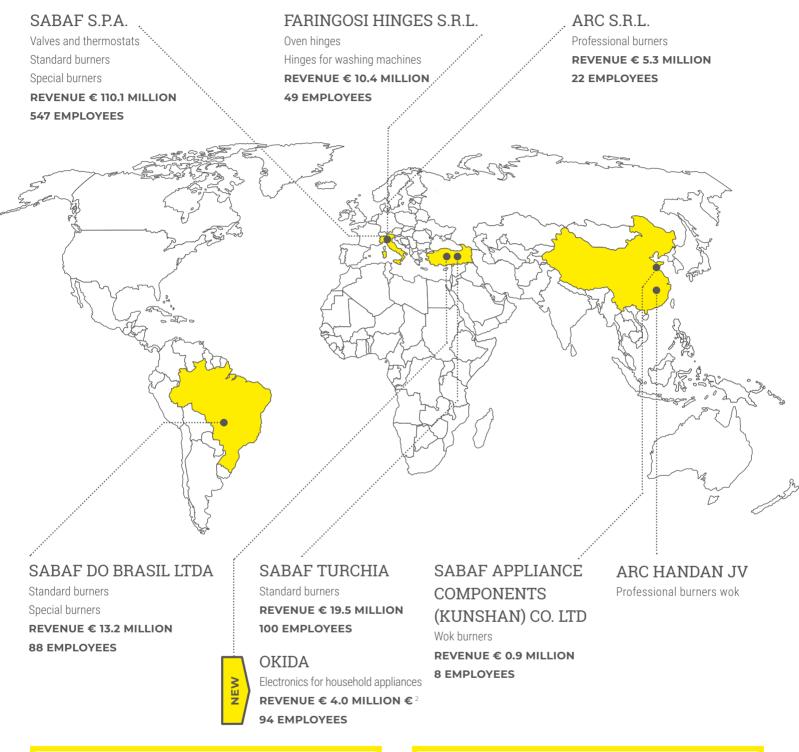
Standard burners are the most popular products, also produced in Turkey and Brazil.

The product family with the highest growth rates is that of special burners, where innovation has been strongest in recent years.

There was a good increase in sales of hinges, benefiting from solid partnerships with the main customers and the development of new products that anticipated market requirements.

Starting from 2016, the Group entered the professional burners sector, through the acquisition of A.R.C. This is a business that, thanks to its integration with Sabaf, offers excellent prospects for further development.

The industrial footprint







² as from September 2018

 $^{^{\}scriptscriptstyle 3}$ including temporary personnel (with temporary work contract or similar)

THE REFERENCE MARKETS

In Western Europe, which accounts for about half of the final destination market for Sabaf products, the saturation level reached by cooking appliances (the portion of families of household appliances) is close to 100%. Therefore, purchases of new appliances are mainly represented by replacement purchases. The move, purchase or renovation of a house often provide opportunities to purchase a new cooking appliance. Therefore, the market trend is directly affected by the general economic trend and in particular by the levels of disposable income for households, consumer confidence and the trend in real estate activity.

However, the level of saturation is often lower in other markets. The higher economic development rates and the more favourable demographic trend compared to Western Europe are creating great opportunities for groups such as Sabaf, which can both work with multinational manufacturers of household appliances and support local producers.

COUNTRIES AND CUSTOMERS 4



In line with the followed commercial policies, most of the active commercial relations are characterised by relations consolidated over the long term. There are 32 customers with annual sales of more than € 1 million (as in 2017). The distribution by class of turnover is as follows:

in euro	2018	2017
> € 5,000,000	7	7
from € 1,000,001 to € 5,000,000	25	25
from € 500,001 to € 1,000,000	20	16
from € 100,001 to € 500,000	64	52
< € 100,000	351	310

In addition to the management structure at the Ospitaletto headquarters, the commercial network is based on the subsidiaries in Brazil, Turkey, the USA and China. There are 9 agency relationships, mainly relating to non-European markets.

⁴ Data processed considering also Okida. The Sabaf Group's share of international sales (excluding Italy and Western Europe) rose from 61.7% in 2013 to 70.8% in 2018

⁵ With sales over € 1,000

Sabaf's international development: challenges and opportunities

ANALYSIS OF THE SCENARIO

PERFORMANCE DATA 6

ITALY



In the last ten years, the production of household appliances in Italy has been strongly reduced: some players left the sector and others relocated part of their activities to Turkey and Eastern Europe. There are still manufacturers focused mainly on the up-market or on special products, strongly dedicated to exports, which continue to show excellent results

The importance of the Italian market for Sabaf is consequently lower than in the past. The majority (estimated at approximately 80%) of Sabaf's sales in Italy are destined for household appliances exported by our customers.

31,579 | **21.0%**



36,523 | **24.3%**





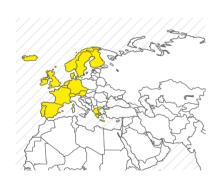
41,244 | **29.9%**



42,277 | **31.0%**



WESTERN EUROPE



The same trend that characterised Italy was also seen in the other Western European countries: in Western Europe,

up-market products remain high, where Sabaf is significantly increasing its share.

12,337 | **8.2%**









2015



EASTERN EUROPE AND TURKEY



Turkey is now the state where the largest number of household appliances are produced. In this context, the opening of a production plant in Turkey and the acquisition of Okida Elektronik (September 2018) are key elements in support of the growth strategy.

Sabaf estimates that about 75% of sales in Turkey are exported by our customers (mainly in Europe); however, the Turkish domestic market is of increasing importance: the average age of the population, the number of new households and the increase in income are converging indica-

tors of a growing demand for durable goods. Contingent factors such as the currency crisis of 2018 can lead to temporary reversals of this trend.

The Group's strategy is to further develop its activities in Turkey in the coming years.

The Group is also active in other Eastern European markets, where it intends to conclude new partnership agreements with customers and strengthen those already in place.

46,301 | **30.7%**



42,824 | **28.5**%



34,123 | **26.1%**



35,125 | **25.5%**



36.198 | **26.6%**



⁶ Sales by geographical area (€/000) and percentage incidence on Group sales

ANALYSIS OF THE SCENARIO

PERFORMANCE DATA⁶

NORTH AMERICA AND MEXICO



Sabaf's presence in North America is relatively recent, but sales and market share have been growing steadily in recent years. Future plans also include the development of products co-designed with major customers and a more direct coverage on the market, possibly also through a production site.

15,071 | 10.0%

12,735 | **8.5%**

11,304 | **8.6%**

9,603 | 7.0%

7,044 | **5.2%**

2018

2017

2016

2015

2014

SOUTH AMERICA



For future development, Sabaf can count on a consolidated production presence (a factory in Brazil has been operating since 2001).

The Sabaf Group believes that the development potential of this area is still extremely interesting, considering the significant size of the market and the demographic growth trends.

The product range for the local market was recently expanded, with the production of special burners in Brazil, also to meet the specific nature of demand.

Other markets of great interest to the Group are those in the Andean area.





2018

22.938 | **15.3%**

2016

20.847 | **15.9%**

20.815 | **15.1%**



18,324 | **13.4%**



MIDDLE EAST AND AFRICA



Sabaf has a long-standing presence and reputation in the Middle East and Africa. The social, political and economic difficulties of the area inevitably condition the performance on these markets.

The Group also considers the Middle East and Africa among the most promising markets in the medium term, also in view of demographic trends and the growing rate of urbanisation.

12,303 | **8.2%**



2018

2017

13,009 | **8.6%**



16,759 | **12.1%**



2015

2014

16,871 | **12.4%**

ASIA AND OCEANIA



China, with its production of about 26 million hobs per year, is the most important market in the world.

The Group, aware that it offers high quality products that are increasingly competitive compared to those supplied by local competitors, aims to establish long-term partnerships with the main Chinese hob manufacturers.

Another market with great potential is the Indian market, for which Sabaf developed a range of dedicated burners.

The results achieved on these two markets are still marginal but growth in these areas remains a strategic priority for the Group.

7,590 | **5.0%**

10,516 | 7.0%

8,088 | **6.2%**

7,019 | **5.0%**

6,907 | **5.0%**

2018

2017

2016

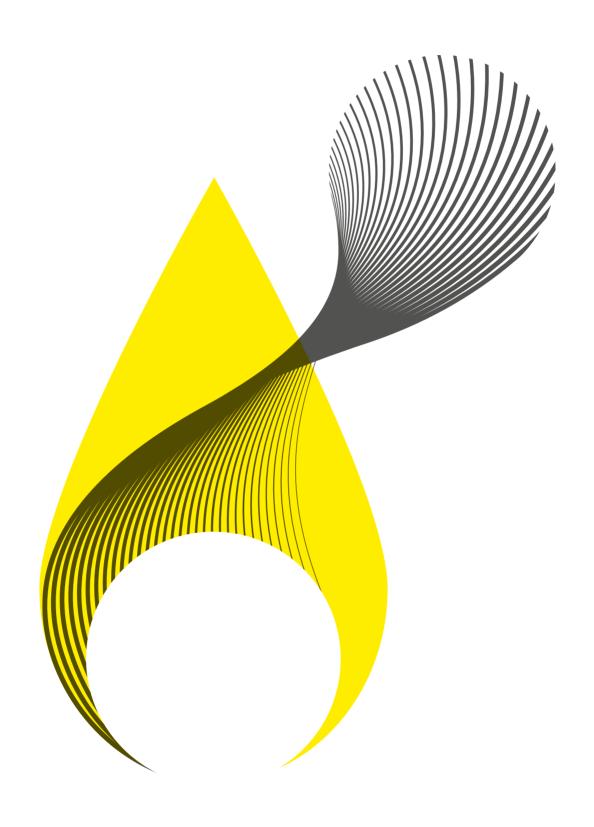
2015

2014



Positioned for change

Change is inevitable, it means growing and evolving within one's environment.
Sabaf's approach is to see market challenges as new opportunities and conscientiously tackle risk by transforming threats into prospects.



Consolidated disclosure of non-financial information

(prepared pursuant to Article 4 of Legislative Decree 254/2016)

Methodological note	27
Letter of the Chief executive officer to the stakeholders	28
Business model, strategic approach and sustainable creation of value	30
Corporate Governance, Risk Management and Compliance	44
Sabaf and employees	62
Sabaf and environment	84
Sabaf, the management of product quality and customer relations	90
Sabaf and supply chain management	92
Sabaf, Public Administration and Community	94
Sabaf and shareholders	95
Sabaf and lenders	97
Sabaf and competitors	97

Methodological note

PREPARATION CRITERIA

The consolidated disclosure of non-financial information of the Sabaf Group (hereinafter also referred to as the "Disclosure"), prepared in accordance with Art. 4 of Legislative Decree 254/2016 as amended (hereinafter also referred to as the "Decree"), contains information (policies practised, risks and related management methods, management models and performance indicators) on environmental, social, personnel, human rights and anti-corruption issues, to the extent necessary to ensure understanding of the activities carried out by the Group, its performance, results and impact. Each section also describes the main risks, generated or suffered, related to the above issues and deriving from the Group's activities.

The Sabaf Group identified the new GRI Sustainability Reporting Standards (hereinafter also referred to as "GRI Standards") defined by the Global Reporting Initiative (GRI) in 2016 as the "reference standard" for fulfilling the obligations of Legislative Decree 254/2016, as the most widely recognised and internationally disseminated Guidelines. Starting with the current financial year, Sabaf made the transition from GRI G4 Guidelines to GRI Standards. This Disclosure is prepared according to the "in accordance - core" reporting option. The process of defining the contents and determining the relevant aspects, also in relation to the areas envisaged by the Decree, was based on the principles envisaged by GRI Standards (materiality, stakeholder inclusiveness, sustainability context, completeness, comparability, accuracy, timeliness, clarity, reliability and balance). To help readers find the information in the document, the GRI Content Index is at the bottom of the disclosure.

This Disclosure was approved by the Board of Directors on 26 March 2019 and will be prepared annually. In accordance with one of the options envisaged by Art. 5 of Legislative Decree 254/2016, it constitutes a separate report from the Report on operations.

REPORTING BOUNDARY

The reporting boundary of qualitative and quantitative data and information contained in the Consolidated Non-Financial Disclosure of the Sabaf Group refers to the performance of the Sabaf Group (hereinafter also referred to as "Group" or "Sabaf") for the year ended 31 December 2018 with reference to companies consolidated on a line-by-line basis, with the exception of:

- Okida Elektronik, a company over which the Group acquired control in September 2018. This company is included in the reporting boundary of the consolidated financial statements as from 4 September 2018 but was not included in the reporting boundary of the Disclosure because, despite the data collection integrating process has been initiated, at the date of preparation, not all the information required is yet available. Note also that the extension of the reporting boundary to Okida would not have had a significant impact, given the size of the Company (11% of the total number of Group employees) and the date from which it became part of the Group;
- Sabaf Immobiliare s.r.l., a company without employees active in the management of industrial buildings of Ospitaletto, rented to the parent company Sabaf S.p.A., and owner of some housing units for sale;
- Sabaf Appliance Components Trading Ltd, companies whose liquidation process is being completed.

REPORTING PROCESS

The preparation of the Group's consolidated disclosure of non-financial information was based on a structured reporting process that involved all Italian and foreign structures, departments and companies responsible for the relevant areas and the related data and information that are the subject matter of the Group's non-financial reporting. They were asked to contribute to the identification and evaluation of significant projects/initiatives to be described in the document and to data collection, analysis and consolidation phase. each for its own area of competence. In particular, the data and information included in this Disclosure derive from the company information system used for the management and accounting of the Group and from a non-financial reporting system (data collection sheets) specifically implemented to meet the requirements of Legislative Decree 254/2016 and GRI Standards. In order to ensure the reliability of the information contained in the Disclosure, directly measurable quantities have been included, limiting the use of estimates as much as possible. Calculations are based on the best information available or on sample surveys. The estimated quantities are clearly indicated as such. The economic and financial data and information are derived from the Consolidated Financial Statements at 31 December 2018.

Letter from the Chief Executive Officer to stakeholders

Dear shareholders and stakeholders,

In 2018, Sabaf once again achieved excellent results, in line with the company's historical trends.

Results achieved thanks to the Group's solid competitive position and the launch of the 2018-2022 business plan. A plan presented a year ago, which envisages a path of growth both organic and through acquisitions, through an acquisition policy that can also increase the product range in sectors adjacent to the current ones.

The first step in this strategy of development and diversification of the product range was, in recent months, the acquisition of Okida Elektronik, whose performance not only helps to strengthen the Group's already interesting growth prospects but also boosts its innovative capacity.

In terms of production, remember that in 2018, Sabaf reached the goal of 500 million burners: a result that confirms our leadership in the field of components for gas cookers.

A continuous technological and innovative development that in recent weeks was characterised by the strengthening of the Group's technical and commercial relationships with major global players, the most important of which are historical partners of Sabaf. With them we further strengthen our relationship of mutual trust, based on respect, quality of service and - precisely - innovation. These are customers who have decided to increase supplies from Sabaf through new projects that will be implemented in the next two to three years.

They are the prerequisite and guarantee necessary for organic growth and strengthening of our historical business.

These projects will lead to significant increases in our sales in the profitable North American market. A market that, for some years now, has shown double-digit growth rates with renewed attention from manufacturers of household appliances in the selection of their supplier partners. After all, last year, two of our long-standing European customers, Candy and Gorenje, were acquired by major Chinese players, while one of our first customers underwent significant downturns in the European market, as well as a contraction in demand in the Turkish and Middle Eastern markets.

These are all signs of confirmation of an increasingly complex global market that requires capacity for continuous change and permanent adaptation to the demand requirements.

In other words, our future requires flexibility and dynamism, understood not only as mental, collective and individual attitudes, but also as the adaptation of processes to the specific demands of the market and its particular characteristics. This involves expanding the range of our products, but also overcoming our technical and structural limitations in order to create customised and complex solutions.

The customer increasingly demands quick and tailor-made responses, which forces us to learn to live within a continuous innovation. Therefore, ad hoc solutions and customised products are needed in order to meet the changing demands of the market: their design capacity implies less rigid, faster processes and a general orientation towards change for which everyone must feel responsible and invested with for what of direct concern. The competitive bar rises, and only those who can adapt - namely the most flexible, fast and dynamic - can build a solid and successful future.

Today's big numbers are the sum of many different orders: it is no longer enough to start the machines and have the products in the catalogue; they need to provide customers with tailor-made solutions. It is a process that also involves individual responsibilities and attitudes at the heart of which people remain fundamental. We continue to give them priority, but we also ask each of them to adapt to permanent changes. A com-

mitment to which Sabaf intends to give due recognition with training, incentive and enhancement systems.

Change, but in the awareness of our past and of a history that has allowed us to become a leading Group in the sector: therefore, we will continue, as we have always done, to invest in quality and innovation.

We also know that the growing markets coincide more and more with those of distant countries, where the demographic and economic development are higher than in our country: North and South America, India, China. We will take advantage of all the opportunities, possibly even setting up foreign production units to complement those already existing in Turkey, Brazil and China. Production in Italy remains predominant and central, related to a competitiveness that must be sought every day through efficiency, quality, production excellence, the lowering of the break-even point. Within a Country where it is certainly not easy to do business.

All this with a view to long-term sustainability, which has always been part of our business philosophy.

Finally, I would like to point out that in 2018 Sabaf won again the "Oscar di bilancio" in the category of "Small Listed Companies".

It is an award that we had already received in 2004, 2013 and 2017: we know that transparent and comprehensive communication makes investor relations easier, but also helps to create good internal cohesion.

"Born to burn" is the slogan of our new advertising campaign launched in early 2019. We hope that our passion will also burn the stages of further growth.

We must overcome doubts and fears and have the courage and curiosity to explore new opportunities in order to be able to capture the richness that the new can bring.

The Group has the characteristics, the strengths and the people to do so.

Pietro lotti

Business model, strategic approach and sustainable creation of value

Strategic approach and creation of value

SUSTAINABLE VALUE CREATION

For the Sabaf Group, respect for business ethics and socially responsible behaviour are the fundamental elements of its business model. Accordingly, the Group developed a strategy and a governance model that can guarantee sustainable growth over time.

The Sabaf Group is aware that sustainable growth depends on the degree

of harmony and the sharing of values with its stakeholders: compliance with common values increases mutual trust, encourages the development of common knowledge, and therefore contributes to the containment of transaction costs and control costs; in essence, it benefits the Group and all its stakeholders.

VALUES, VISION AND MISSION

Sabaf takes the Person as its original value and therefore as the fundamental criterion of every choice: this results in an entrepreneurial vision that ensures dignity and freedom to the Person within shared rules of behaviour. The centricity of the Person represents a universal value, i.e. a hyper-standard applicable without differences in time and space. In compliance with this universal value, the Sabaf Group operates by promoting cultural diversity through the criterion of equity in space and time. Such a moral commitment

implies an a priori renunciation of all choices that do not respect the physical, cultural and moral integrity of the Person, even if such decisions can be efficient, economically convenient and legally acceptable. Respecting the value of the Person means that, first of all, the dimension of the category of Being in relation to Doing and Having is the overriding consideration, and therefore implies the protection and enhancement of the "essential" manifestations expressing the fullness of the Person.



The Charter of Values of Sabaf

The Charter of Values is the governance tool through which the Sabaf Group clearly explains the Company's values, standards of behaviour and commitments in relations with its stakeholders – shareholders, employees, customers, suppliers, lenders, the Public Administration, the community and the environment. The spirit of the Charter is to reconcile the principles of economic management with ethics based on the centricity of Man, as an essential condition for the sustainable growth of business in the long term. Sustainable growth, intended as the ability to combine at the same time:

- economic sustainability, i.e. operate in such a way that company choices increase the value of the company not only in the short term but above all are able to guarantee business continuity in the long term through the application of an advanced model of corporate governance;
- **social sustainability**, i.e. promote ethical behaviour in business and reconcile the legitimate expectations of the various stakeholders in accordance with common shared values;
- **environmental sustainability** i.e. produce by minimising the direct and indirect environmental impacts of its production activities to preserve the natural environment for the benefit of future generations in compliance with current laws on the subject.

The Charter aims to give a vision of ethics, focusing mainly on positive and just actions to be taken and not only on incorrect behaviour to be avoided. This vision is the basis for a positive use of freedom by decision-makers, where ethical references guide decisions in a manner consistent with the Group's culture of social responsibility. The Sabaf Group aims to develop a process based on people being given a sense of responsibility within shared rules of behaviour with which to voluntarily comply.

According to this approach, it is still imperative to comply absolutely with the law and regulations in force in Italy and in the other countries where the Group operates, as well as with all the internal regulations of the Group and the values declared in the Charter.

The Charter of Values also represents a reference document as part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and, as such, sets out a series of general rules of behaviour Group employees are required to comply with.

Table summarising the Policies of the Sabaf Group with reference to the contents of Legislative Decree 254/2016 as amended

TOPIC ENVISAGED BY LEGISLATIVE DECREE 254/2016	REFERENCE POLICIES
ENVIRONMENT	
 Raise staff awareness and train the personnel to promote environmental awareness Minimise direct and indirect environmental impacts Adopt a precautionary approach to environmental impacts Encourage the development and diffusion of environmentally friendly technologies and products Define environmental objectives and improvement programmes Search for the right balance between economic objectives and environmental sustainability 	Charter of Values Manual of the Integrated Management System of Health and Safety, Environment and Energy in compliance with ISO 14001, ISO 50001 and OHSAS 18001 standards
HUMAN RIGHTS	
 Basic principles Adopt socially responsible behaviour Promote respect for the fundamental human rights of workers in all countries where the Group operates Avoid all forms of discrimination and favouritism in respect of employment and occupation Enhance and respect diversity 	Charter of Values Manual of the Social Responsibility Management System in compliance with SA8000 Standard
PERSONNEL	
 Basic principles Encourage continuous learning, professional growth and knowledge sharing Provide clear and transparent information on the tasks to be carried out and the position held Encourage teamwork and the dissemination of creativity in order to allow the full expression of individual skills Adopt criteria of merit and competence in employment relationships Encourage the involvement and satisfaction of all the personnel 	Charter of Values Manual of the Social Responsibility Management System in compliance with SA8000 Standard
PERSONNEL / HEALTH AND SAFETY	
 Basic principles Reach working standards that guarantee health and maximum safety, also through the modernisation and continuous improvement of workplaces Minimise any form of exposure to risks at work Disseminate the culture of risk prevention through systematic and effective training Promote the protection not only of oneself, but also of colleagues and third parties Encourage the diffusion of products with security systems 	Charter of Values Manual of the Integrated Management System of Health and Safety, Environmer and Energy in compliance with ISO 1400 ISO 50001 and OHSAS 18001 standards
ANTI-CORRUPTION	
Basic principles Raise awareness among all those who work for Sabaf so that they behave correctly and transparently in the performance of their activities Comply with local anti-corruption regulations	Group Anti-Corruption Policy Organisation, management and control Model pursuant to Legislative Decree 231/2001
SOCIAL / SUPPLY CHAIN	
Basic principles Ensure absolute impartiality in the choice of suppliers Establish long-term relationships based on fairness in negotiations, integrity and contractual fairness	Charter of Values

The Charter of Values and the Anti-Corruption Policy are applied and disseminated in all Group companies.

Sabaf S.p.A. adopts a Social Responsibility Management System certified and compliant with the SA8000 standard and an integrated management system of Health and Safety, Environment and Energy certified and compliant with ISO 14001, ISO 50001 and OHSAS 18001 standards.

Farginosi Hinges s.r.l. adopts a Health and Safety management system certified and compliant with OHSAS 18001 standard.

In any case, the ISO 14001, OSHAS 18001, ISO 50001 and SA8000 standards are sources of reference and inspiration for the entire Group.

The Organisation, Management and Control Mode pursuant to Legislative Decree 231/2001 is adopted by Sabaf S.p.A. and Faringosi Hinges s.r.l.



Vision

Combine business decisions and results with ethical values by going beyond family capitalism and opting for a managerial rationale oriented not only towards the creation of value but also towards the respect of values.



Mission

Consolidate the technological and market leadership in the design, production and distribution of the entire range of components for household gas cooking appliances through constant attention to innovation, safety and the enhancement of internal expertise.

Associate the growth of company services with social and environmental sustainability, promoting an open dialogue with the legitimate expectations of stakeholders.

BUSINESS MODEL

Strategic pillars of Sabaf's Business Model

In line with its shared values and mission, Sabaf believes that there is a successful industrial and cultural model to be consolidated both through organic growth and growth through acquisitions.

The distinctive features of the Sabaf model are set below:

Innovation

Innovation represents one of the essential elements of Sabaf's industrial model and one of its main strategic levers. Thanks to continuous innovation, the Group has managed to achieve excellent results, identifying technological and production solutions that are among the most advanced and effective currently available and establishing a virtuous circle of continuous improvement of processes and products, until acquiring technological competence with characteristics that are difficult to match for competitors. The know-how acquired over the years in the development and internal production of machinery, tools and presses, which is integrated synergistically with the know-how in the development and production of our products, represents the critical success factor of the Group. With the acquisition of Okida, Sabaf has also acquired a strong electronic know-how that, together with the traditional and strong mechanical skills, can further expand the business spaces for the Group.

The investments in innovation allowed the Group to become a world leader in a highly specialised sector and to achieve high levels of technological development, specialisation and production flexibility over time. The production sites in Italy and abroad are designed to guarantee products according to the highest levels of technology available today and represent a cutting-edge model both for environmental protection and safety of the employees.

Eco-efficiency

Sabaf's product innovation strategy is based on the search for improved environmental performance. Attention to environmental issues is reflected both in innovative production processes that have a lower energy impact in the manufacture of products, and, above all, in the design of eco-efficient products during their daily use. Innovation efforts are directed towards the development of burners that reduce fuel consumption (natural gas or other gases) and emissions (carbon dioxide and carbon monoxide, in particular) in users.

Safety

Safety has always been one of the essential elements of Sabaf's business project. Safety for Sabaf is not just a matter of complying with existing standards but a management philosophy oriented towards the continuous improvement of its performance, in order to guarantee the end user an increasingly safe product. In addition to investing in research and development of new products, the Group has chosen to play an active role in disseminating a safety culture: Sabaf has long been promoting the introduction of regulations worldwide - in the various institutional venues - that make it compulsory to adopt products with thermoelectric safety devices. Sabaf also promoted the ban on the use of zamak (zinc and aluminium alloy) for the production of gas valves for cooking, in consideration of the intrinsic danger. To date, the use of zamak is still permitted in Brazil, Mexico and other South American countries, limiting business opportunities in the valves segment for Sabaf.

Success on international markets and partnerships with multinational groups

Sabaf pursues its growth through its success in international markets by trying to replicate its industrial model in emerging countries and adapting it to the local culture.

In line with its reference values and mission, the Group is seeking to bring know-how and cutting-edge technologies to these countries, operating in full respect of human rights and the environment and in compliance with the United Nations Code of Conduct for Transnational Corporations. This choice is driven by the awareness that only by operating in a socially responsible way it is possible to ensure long-term development of industrial experience in emerging markets.

The Group also intends to further strengthen its collaboration with customers and its position as sole supplier of a complete range of products in the cooking components market, also thanks to its ability to adapt production processes to specific customer needs and provide an increasingly wide range of products.

Widening the range of components and development through acquisitions

The continuous expansion of the range aims to increase customer loyalty through the widest satisfaction of market requirements. The possibility of offering a complete range of components is an additional distinguishing feature for Sabaf compared to its competitors. In order to sustain a dynamic growth path, the Group intends to extend its product range to other components for household appliances. This expansion is pursued both through internal research and through growth through acquisitions, assessing opportunities for partnerships and acquisitions of other companies. Examples of this are the acquisition of a controlling share in A.R.C. s.r.l. in 2016 and 100% in Okida in 2018, through which Sabaf entered the professional burners and electronic components for household appliance sectors.

Enhancement of intangible assets and of its intellectual capital

Sabaf carefully monitors and increases the value of its intangible assets: the high technical and professional competence of the people who work there, the image synonymous with quality and reliability, the reputation of a company attentive to social and environmental issues and the requirements of its stakeholders. The promotion of the idea of work and relations with stakeholders as a passion for a project based on common values in which everyone can recognise themselves symmetrically represents not only a moral commitment, but the real guarantee of enhancement of intangible assets. In this perspective, the sharing of values represents the link between the promotion of a corporate culture oriented towards social responsibility and the enhancement of its intellectual capital.



- Net financial debt € 53,524,000
- · Shareholders' Equity € 119,347,000
- · Invested capital € 172,870,000
- Market capitalisation at 31 December /Shareholders' Equity 1.44

Economic capital

Human capital

Capita

BUSINESS APPROACH

INNOVATION,
ENHANCEMENT
OF INTERNAL RESOURCES
AND CONTINUOUS LEARNING

INTERNATIONALISATION

4

- · Employees 760
- Advanced education: employees with a degree or diploma 59.6%
- · Training hours by employee 22.3
- Investments in training on turnover 0.33%



- Turnover from the top10 customers 45%
- · No. of Customers 371
- Purchases from suppliers in the province of Brescia 30.8%

Relational capital

capital

DISTINCTIVE FEATURES

INTERNAL AND VERTICALISED PRODUCTION OF



- · Production sites 6
- · Real investment on turnover 7.5%
- Value of property, plant and equipment € 75,168,000

Productive capital



- · Brass **789t**
- Aluminium alloys 7,831t
- · Steel **7,861t**
- · Electricity consumed **30,255MWh**
- · Natural gas consumed **3,918,000m³**
- · Water used 139,840m³

Environmental capital



- Hours dedicated to the development of new products **1.3%**
- Hours dedicated to process engineering 2.5%

Intellectual capital PRODUCTS

VALVES AND THERMOSTATS

BURNERS

¹ data includes Okida only as far as economic capital is concerned

QUALITY, INTERNAL AND EXTERNAL SAFETY, **ECO-COMPATIBILITY**

Economic capital

- · Sales revenue +0.3%
- EBITDA as a percentage of sales 19.9%



SUSTAINABILITY

Human capital

- · No. of new employees 90
- · Leaving turnover 10%
- · Strike hours on hours worked 0.07%
- · Injury frequency rate 23.5
- Injury lost day rate 0.17



COMPONENTS AND PRODUCTS

MACHINERY, TOOLS AND PRESSES BASED ON SPECIFIC KNOW-HOW

Relational capital

Productive capital

- Average turnover by customer
 - €353,000
- · Customer complaints 398
- Lawsuits filed against Group companies 3
- No. of samples for customers 1,244





Light alloy valves and thermostats sold 90.6%



ACCESSORIES

ELECTRONIC COMPONENTS

Environmental capital

- · Waste to value of production 0.22
- · CO₂ emissions **18,520t**



Intellectual capital

- · No. of Patents 48
- · No. of codes provided to the first 10 customers **1,939**
- Impact of quality current expenditure on turnover 0.17%



GENERATED AND DISTRIBUTED ECONOMIC VALUE

The analysis of the determination and distribution of economic value among stakeholders, prepared in accordance with the indications of the GRI is shown below. The table was prepared distinguishing between three levels of economic value. The generated one, the distributed one and the one retained by the Group. The economic value represents the overall wealth created by Sabaf, which is then distributed among the various stakeholders: suppliers (operating costs), employees, lenders, shareholders, public administration and community (external perks).

(thousands of Euro)	2018	2017	CHANGE
ECONOMIC VALUE GENERATED BY THE GROUP	160,054	155,408	4,646
Revenue	150,642	150,223	419
Other income	3,298	3,325	(27)
Financial income	373	214	159
Value adjustments	1,600	1,474	126
Bad debt provision	(421)	(93)	(328)
Exchange rate differences	5,384	274	5,110
Income/expenses from the sale of property, plant and equipment and intangible assets	28	(12)	40
Value adjustments to property, plant and equipment and intangible assets	(850)	0	(850)
Profits/losses from equity investments	0	3	(3)
ECONOMIC VALUE DISTRIBUTED BY THE GROUP	137,515	133,063	4,452
Remuneration of suppliers	90,219	88,636	1,583
of which for environmental expenses	667	580	87
Remuneration of employees	34,840	35,328	(488)
Remuneration of lenders	1,206	804	402
Remuneration of shareholders ²	6,071	5,386	685
Remuneration of the Public Administration ³	5,163	2,888	2,275
External perks	16	21	(5)
ECONOMIC VALUE RETAINED BY THE GROUP	22,539	22,345	194
Depreciations and amortisation	12,728	12,826	(98)
Provisions	155	26	129
Use of provisions	(71)	(36)	(35)
Reserves	9,727	9,529	198

 $^{^{\}rm 2}\,\mbox{The}$ amount is estimated on the basis of the proposed dividend

³ Includes deferred taxes

Sabaf 4.0

"Industry 4.0" indicates the fourth industrial revolution, i.e., the one that will lead to a production almost entirely based on the use of intelligent machines, interconnected and connected to the Internet. However, these machines are not yet able to work alone: because a more powerful data processing and storage capacity will have to be combined with a better efficiency in obtaining value. Today, only 1% of the data collected is used by companies to refine their processes on the basis of the information available.

For us, who have been on the road to Industry 4.0 for about ten years, through the use of robots and the ability of the different work phases to communicate with each other, the new frontier is to achieve greater flexibility, to respond faster and with high quality standards to cycles

in an increasingly volatile market.

Our goal is to make the data resulting from these integrations available and usable in real time to the people directly involved in the processes, because it is only the knowledge of man that can guarantee the true revolution 4.0, especially in a verticalised and integrated reality like Sabaf. We must learn to use all this to the best of our ability to achieve higher performance, saving time, waste, costs and energy. We must all become the minds of new and powerful processes. Sabaf's knowledge, its history, tradition, skills and new frontiers of work. Here is what "Industry 4.0" means to us.

Sabaf and the lean philosophy

Japanese model, lean production, total quality. These are the formulas by which the manufacturing industry tries to keep up with the times, with the global challenges that make the market uncertain and competitive advantages not acquired forever. Sabaf has been committed to the philosophy of continuous improvement for some time and applies, both in the factory and in the office, many techniques typical of lean manufacturing and lean office. This is a necessary way not to lose market share in a reality made complicated by the difficult economic moment, not only for the household appliances sector. We also know that continuous improvement is an objective that must concern everyone, at all levels. If we want to keep up with the

times, everyone must **make every effort to do excellently what they already know how to do well**. Everyone is invited to bring out their own skills and to share their experience and knowledge with others.

We are aware that every resource that is misused or not used is a wasted resource, whether it is energy, time, people, intelligence or raw materials.

Finally, we know that continuous improvement implies people's propensity to change, as Charles Darwin taught us: it is not the strongest or the smartest species to survive, but the one that best adapts to change.



The acquisition of Okida

On 4 September 2018, the Turkish company Okida Elektronik joined the Sabaf Group. The acquisition was carried out through the Turkish subsidiary Sabaf Turkey for 70% and directly by Sabaf S.p.A. for the remaining 30%.

Okida was founded in Istanbul in 1987 by Mr. Gurol Oktug and is a leader in Turkey in the design, manufacture and sale of electronic control boards, timers, display and power units for ovens, hoods, vacuum cleaners, refrigerators and freezers.

The acquisition of Okida represented the first step towards the implementation of the 2018-2022 Business Plan, in line with the strategy of

expanding the product range in components for household appliances and the acquisition of e-skills.

Over the years, the Company has been characterised by a constant growth and a profitability stable at levels of excellence. In 2018, Okida achieved sales of € 11.1 million, of which 40% directly abroad.

At 31 December 2018, the Company had 94 employees (59 men and 35 women), 15 of whom were in Research and Development. The average age of the personnel is 35 years old.

GOVERNANCE OF SOCIAL RESPONSIBILITY AND STAKEHOLDER ENGAGEMENT

Social responsibility in business processes

To transform the values and principles of sustainable development into intervention choices and management activities, Sabaf applies a structured methodology, the key factors of which are as follows:



Sharing values, mission and sustainability strategy.



Training and communication.



An internal control system capable of monitoring risks (including social, environmental and reputational risks) and verifying the implementation of commitments to stakeholders.



Key performance indicators (KPIs), which can monitor economic, social and environmental performance.



A clear and complete reporting system, able to effectively inform the different categories of stakeholders.



A stakeholder engagement system, to compare with the expectations of all stakeholders and to receive useful feedback for continuous improvement.



The precautionary approach

The awareness of the social and environmental aspects that accompany the Group's activities, together with the consideration of the importance of a cooperative approach with stakeholders and the Group's good reputation, has led Sabaf to adopt a **precautionary approach** in managing the economic, social and environmental variables that it has to manage on a daily basis. To this end, the Group analysed spe-

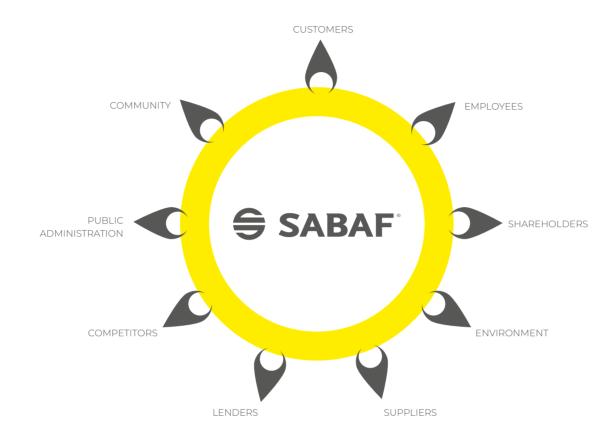
cifically the main risks of the different operating dimensions.

Detailed information on the internal control system and on the risk management system is provided in the next paragraph. "Corporate Governance, Risk Management and Compliance".

Stakeholder engagement

Sabaf is committed to constantly strengthening the social value of its business activities through careful management of relations with stakeholders. The Group intends to establish an open and transparent dialogue, encour-

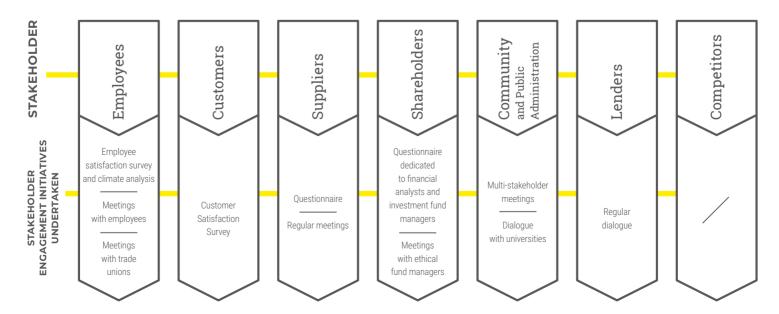
aging opportunities for discussion in order to identify lawful expectations, increase trust in the Company, manage risks and identify new opportunities.



The identification of stakeholders is an essential starting point for defining social and environmental reporting processes. The "stakeholder map" provides a summary representation of Sabaf's main stakeholders, identified on the basis of their business characteristics, the characteristic aspects of the market and the intensity of their relations with the latter. The Annual Report

is the preferred communication tool for presenting the significant economic, social and environmental performance achieved during the year.

The initiatives for involving each stakeholder that are carried out periodically are described below (generally every two or three years). The relevant issues arising from these activities are reported in the following paragraphs.



In 2018, in addition to the stakeholder engagement activities that take place on an ongoing basis, employee satisfaction and corporate climate was analysed in Sabaf S.p.A.



Sabaf complies with the Code of Conduct of CECED

Sabaf complied with the code of conduct of CECED
(The European Committee of Manufacturers
of Domestic Equipment), an association representing
over 280 companies in the household appliances industry.

The **CECED Code of Conduct** confirms the commitment of the European household appliance industry to **ethical** and **fair** behaviour. The Code aims to promote fair and sustainable standards in **working conditions** and **environmental protection** to support **fair competition** in **global markets**.

The producers complying with the Code commit themselves **voluntarily** to implement decent working conditions, which include compliance with common standards regarding **minimum age**, **working hours**, **hygiene and safety conditions**, respect for **freedom of association** and **collective bargaining**, as well as respect for **environmental standards**.

The signatory companies also undertake to **raise awareness** among their **suppliers** of the principles of the Code of Conduct and encourage them to pursue them. They also require that the same principles be proposed to the whole supply chain through the latter.

The Annual Report of Sabaf is also the tool through which the Group reports year by year on the practical implementation of the principles of the Code and the progress achieved, as specifically required of the companies complying with it.

Sabaf complies with the Global Compact

In April 2004, Sabaf complied formally with the Global Compact, the United Nations initiative for companies that commit to upholding and promoting the ten universally accepted principles of human rights, labour rights, environmental protection and anti-corruption. With the publication of the 2018 Annual Report, we renew our commitment to making the Global Compact and its principles

an integral part of our strategy, culture and day-to-day operations, and we also commit to explicitly declare our commitment to all employees, partners, customers and the general public.

The consolidated disclosure of non-financial information sets out in detail the actions taken by the Sabaf Group in support of the ten principles.

THE 10 PRINCIPLES OF THE GLOBAL COMPACT

Human rights Principle I Businesses should support and respect the protection of internationally proclaimed human rights; Principle II make sure that they are not - even if indirectly - complicit in human rights abuses. Labour Principle III Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. Principle IV The elimination of all forms of forced and compulsory labour. Principle V The effective abolition of child labour. Principle VI The elimination of discrimination in respect of employment and occupation, Environment Principle VII Businesses should support a precautionary approach to environmental challenges and Principle VIII undertake initiatives to promote greater environmental responsibility; and Principle IX encourage the development and diffusion of environmentally friendly technologies. Fight against corruption

Businesses should work against corruption in all its forms, including extortion and bribery.

Principle X

MATERIALITY ANALYSIS

The GRI Standards require that the contents of the Consolidated disclosure of non-financial information be defined on the basis of a materiality analysis. In compliance with the requests of GRI Standards, Sabaf has started since 2014 a process of identifying the (relevant) material aspects to be reported, i.e. those aspects:

- of significant economic, environmental or social impact for Sabaf's business
- that could substantially affect the assessments and decisions of stake-holders.

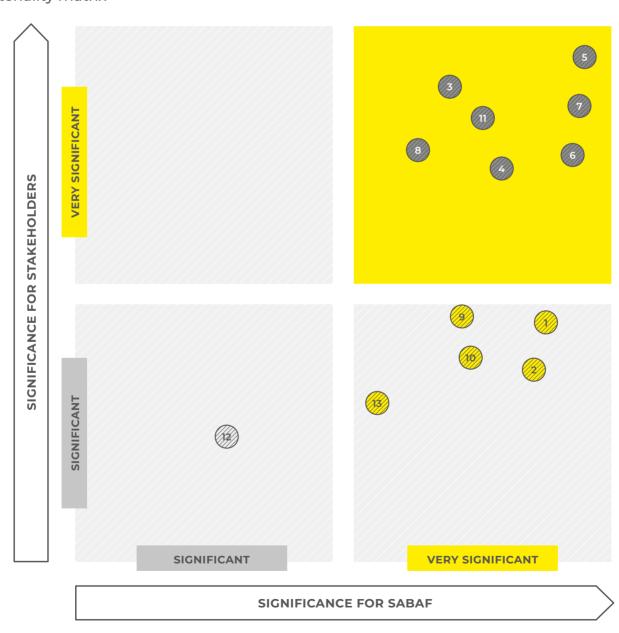
From this perspective, materiality takes into consideration not only the point of view of the organisation but also that of stakeholders.

The most relevant aspects were updated in 2017 and confirmed in 2018, taking into account the business priorities and the development of the external scenario.

It is noted that in defining material aspects, the following topics are considered preconditions for operating and are therefore considered very important for both Sabaf and its stakeholders:

- a) creation and distribution of sustainable value over time (Economic Performance GRI 201);
- b) a transparent and effective governance system to support business (Governance structure GRI 102-18);
- c) constant attention to compliance with the law in the performance of its activities ⁴ (Anti-Corruption GRI 205 e Environmental Compliance GRI 307).

Materiality matrix 5



⁴ This includes the fight against corruption, which is an essential aspect of managing the Group's business and therefore included in the preconditions, and is discussed in this document in the section "Corporate Governance, Risk Management and Compliance"

⁵ Only the topics considered relevant by the organisation and subject matter of reporting are represented

Material aspects

ID	MATERIAL ASPECT	IMPORTANCE OF THE ASPECT FOR SABAF	LINK TO THE ASPECTS OF GRI STANDARDS	INTERNAL IMPACTS	EXTERNAL IMPACTS*
	Personnel training	Training activities with the aim of guaranteeing the continuous professional growth of employees	Training and education GRI 404	Sabaf	
(2)	Industrial relations	Relations between Sabaf and the internal trade union representatives, based on the principles of transparency and mutual correctness	Freedom of Association and Collective Bargaining GRI 407 Labour Management Relations GRI 402	Sabaf	Trade unions
3	Remuneration and incentive policy	Definition of fixed and variable components of remuneration for employees Incentive system based on the achievement of pre-established targets in order to pursue company targets	Market presence GRI 202 Training and education GRI 404	Sabaf	Trade unions
4	Emissions into the atmosphere, waste and management of environmental impacts	Definition of monitoring and reduction activities of emissions of polluting substances into the atmosphere and of waste generated by the production processes of Sabaf	Energy GRI 302 Emissions GRI 305 Effluents and waste GRI 306	Sabaf	Suppliers
5	Research and innovation of products and processes also with reference to safety and environmental performance	Identification of new technological and production solutions (also with a special attention to safety and environmental performance) that allow the Group to strengthen its leadership in the industrial sector to which it belongs	Customer Health and Safety GRI 416	Sabaf	Customers
6	Partnership with multinational groups	Sabaf's opening to strategic collaborations with the main players in the sector	**	Sabaf	
7	Organic growth and growth through acquisitions	Boost the Group's expansion, both through organic growth and through acquisitions, maintaining the excellence of its economic results and preserving its financial solidity.	Employment GRI 401	Sabaf	
8	Customer satisfaction and customer support	Ability to respond effectively to customer expectations, at all stages of the relationship (from design to after-sales service)	**	Sabaf	
9	Production quality and efficiency	Search for better product or process performance and solutions in terms of environmental impact Designing new eco-efficient products	Please refer to aspects 4 and 5	Sabaf	
110	Management of relations with suppliers, supplier assessment and contractual conditions	Sabaf's commitment to defining a relation with the supply chain based on the principles of fairness in negotiations, integrity and contractual fairness Sharing corporate values with suppliers Sabaf defines minimum criteria for the creation of a lasting relationship with suppliers, based on the principles of social responsibility	Supplier Social Assessment GRI 414	Sabaf	Suppliers
n	Health and safety of personnel and contractors	Management, in compliance with the regulations on occupational health and safety, of topics related to the health and safety of workers: training, prevention, monitoring, improvement objectives.	Occupational Health and Safety GRI 403	Sabaf	Suppliers
(32)	Diversity and equal opportunities	Commitment to ensuring equal opportunities for women and protected categories	Diversity and Equal Opportunity GRI 405	Sabaf	
13	Protection of Human and Workers' Rights	Protection of human rights as provided for in the "Universal Declaration of Human Rights" and the principles laid down in the conventions of the International Labour Organisation. Socially responsible management of work processes and working conditions in the supply chain according to the requirements of the SA8000 standard	Non-discrimination GRI 406 Supplier Social Assessment GRI 414	Sabaf	Suppliers

^{*} Reporting is not extended to the external boundary
** With regard to these aspects (not directly related to a Material Topic envisaged by the GRI Standards Guidelines), Sabaf indicates in the document the adopted management approach

Corporate Governance, Risk Management and Compliance

Corporate Governance

OVERVIEW

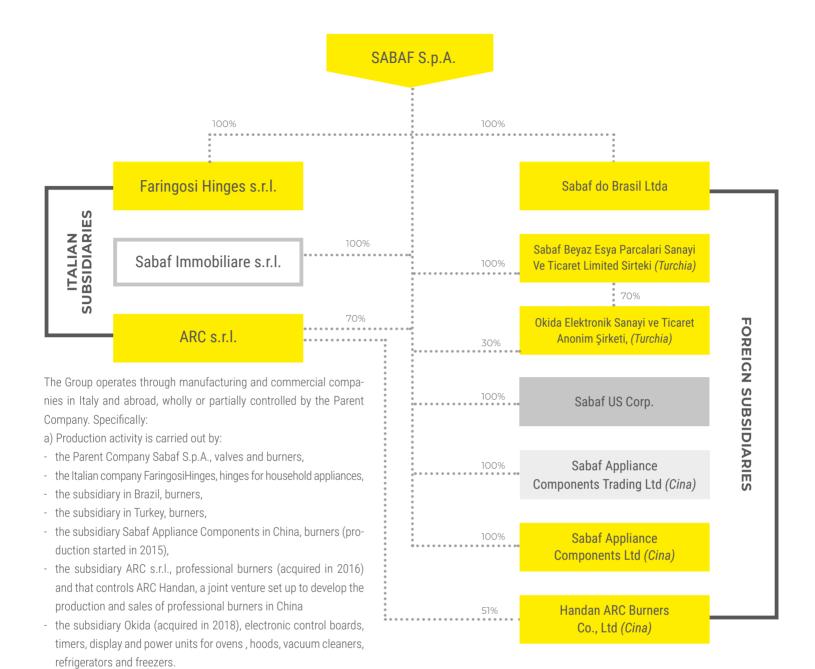
The corporate governance model of Sabaf has always been based on a strict separation between the shareholding structure and management of the Company and of the Group. This model was confirmed also following the changes in the shareholding structure in 2016 and 2017, where, however, the Saleri family is the reference shareholder.



The purpose of this section of the file is to highlight the choices made by Sabaf and the peculiarities of its governance system, revised in the light of the new features introduced by the Corporate Governance Code. Where possible, a comparison with other listed companies is also provided, using the information collected by Assonime in its document Notes and Studies "Corporate Governance in Italy: self-discipline, remuneration and compliance-or-explain", published in January 2019 and concerning the Corporate Governance reports for the 2017 financial year of 225 listed Italian companies, available at 15 July 2018, 91% of which (i.e. 205 companies) has formally chosen to comply with the Corporate Governance Code. The benchmark used below takes into account, where available, a panel of "non-financial" companies only.

Finally, a further comparison is provided on the composition and operation of the Board of Directors, using the data provided by the 2018 Italia Board Index Observatory, published by Spencer Stuart, which analyses the characteristics and operation of the Boards of Directors of the top 100 listed Italian (industrial and financial) companies in order of capitalisation as of February 2018, as well as providing a comparison with the main European and non-European countries.

The information below is a summary but does not replace the "Report on corporate governance and ownership structure" prepared by the Issuer pursuant to Art. 123-bis of the TUF for 2018 and available on the Company's website: **www.sabaf.it**, under the section Investors/Corporate Governance.



- b) The subsidiary Sabaf US carries out commercial supporting activities.
- c) The subsidiary Sabaf Appliance Components Trading (China) is going into liquidation.
- d) The company Sabaf Immobiliare is engaged in the management of the real estate assets.



THE GOVERNANCE STRUCTURE

Sabaf adopted a **traditional** model of management and control, characterised by the presence of:

- **Shareholders' Meetings** (ordinary and extraordinary) called to pass resolutions pursuant to the laws in force and the Company's Bylaws;
- Board of Statutory Auditors, in charge of supervising: (i) compliance with
 the law and Articles of Incorporation and adherence to principles of proper
 management in the performance of corporate activities; (ii) the adequacy of the Company's organisational structure, internal control and risk
 management system and administrative/accounting system; (iii) the procedures for effective implementation of the corporate governance rules
 envisaged in the Corporate Governance Code; (iv) risk management; (v) the
 regulatory audit of the accounts and the independence of the auditing firm;
- **Board of Directors**, in charge of company administration and management of Company operations.

This model is supplemented, in accordance with the provisions of the Corporate Governance Code the Company complied with, by:

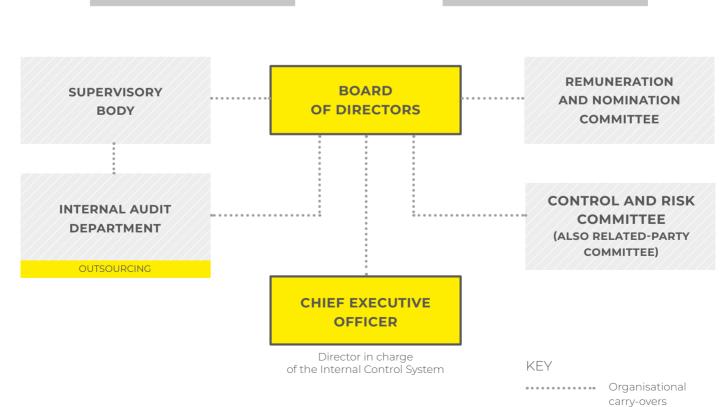
- a) the Committees set up by the Board of Directors within its members, each one with proposal and advisory functions on specific matters and without decision-making powers, such as:
- Control and Risk Committee that also takes on the functions of the Related-Party Committee;
- Remuneration and Nomination Committee that takes on the functions envisaged by the Remuneration Committee and integrates them with those relating to the appointment and composition of the control bodies indicated by the Code:
- b) the *Internal Audit department* in charge of checking the operation and adequacy of the internal control and risk management system.

Finally, the Group's administration and control model is completed by the presence of the *Supervisory Body*, set up following the adoption of the organisation, management and control model pursuant to Legislative Decree 231/2001, adopted by Sabaf since 2006.

The Governance Structure

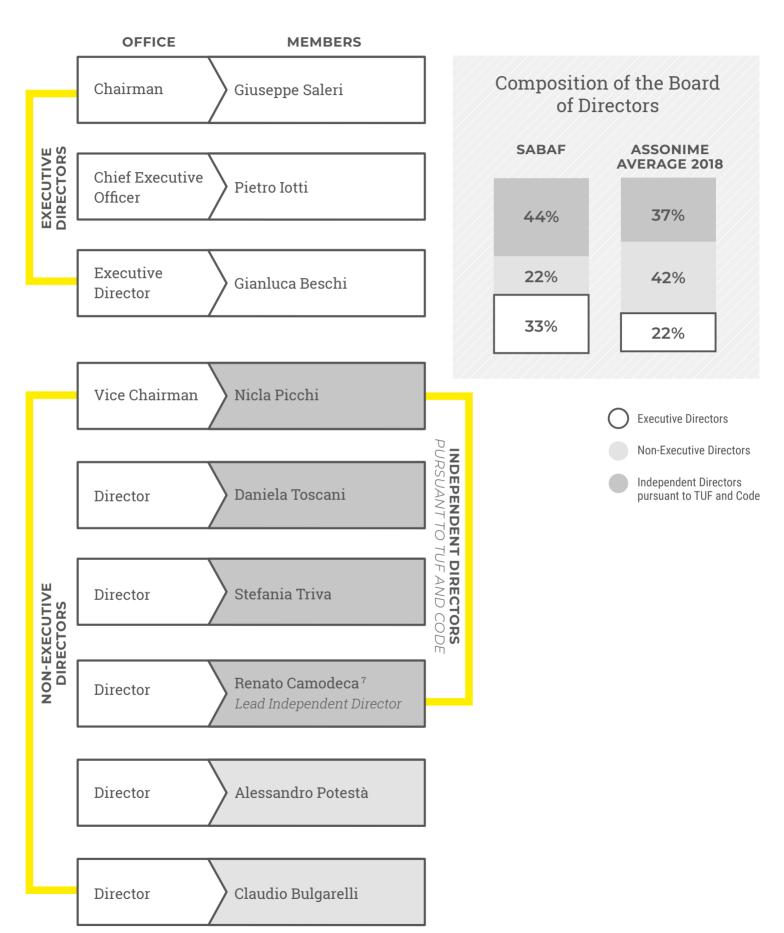
SHAREHOLDERS'
MEETING

BOARD OF STATUTORY AUDITORS



BOARD OF DIRECTORS

The Board of Directors currently in office is composed of 9 members⁶ including: (i) 3 executive directors, (ii) 2 non-executive director and (iii) 4 non-executive and independent directors.



 $^{^{\}rm 6}$ The Curriculum Vitae of the individual members are available on the Company's website

 $^{^{\}rm 7}$ Renato Camodeca resigned on 23 January 2019. The BoD appointed by co-optation Carlo Scarpa

Composition of the Board of Directors

Giuseppe Saleri

Founder of Sabaf, of which he acquired full ownership in 1993. Promoter of listing on the stock exchange in 1998.

Nicla Picchi

Degree in Law, Partner of Studio Picchi & Associati where he works as a lawyer. In Sabaf since 2006, he is also Chairman of SB 231 of Sabaf S.p.A. and of the subsidiary Faringosi-Hinges. He has been chairman of the Control and Risk Committee since 2015.

Pietro Iotti

Mechanical Engineer, holds positions of increasing responsibility in several industrial companies. In Sabaf since 2017, he holds the position of Chief Executive Officer.

Daniela Toscani

Degree in business finance, she has gained many professional experiences in the field of finance and held positions of increasing responsibility in many financial and industrial companies; she joined the BoD of Sabaf in 2018.

CHAIRMAN CHAIRMAN CHAIRMAN

Gianluca Beschi

Certified public accountant, at Sabaf since 1997 as Investor Relations Manager and Head of Management Control. He has been holding the position of Director of Administration, Finance and Control since 2012.

Claudio Bulgarelli

Degree in Mechanical Engineering, entrepreneur, chairman of Fintel srl, joined the BoD of Sabaf in 2018.

Renato Camodeca

He is a university professor of economics, a former member of the Boards of Statutory Auditors and of the Supervisory Boards of listed and unlisted companies.

Stefania Triva

Entrepreneur, since 2014 she has been holding the position of Chairman and CEO of Copan Italia S.p.A., she joined the BoD of Sabaf in 2018.

HON-EXECUTIVE ROM

Alessandro Potestà

Degree in Economics and Commerce, he held management positions in investments and Corporate Development. Today, he is Senior Portfolio Manager at Quaestio Capital Management SGR S.p.A.

Policy on the composition of corporate bodies

On 26 March 2018, the Board of Directors of Sabaf S.p.A. adopted a Policy on the composition of the Corporate Bodies

This Policy sets out the Company's guidelines on the characteristics considered functional to ensuring an optimal composition of the corporate bodies (Board of Directors and Board of Statutory Auditors), with the aim of guiding the names put forward by the Shareholders when renewing the Corporate Bodies, so that the benefits that can derive from a balanced composition of the Board and Board of Statutory Auditors inspired by criteria of diversity are taken into consideration.

The Policy sets out the following characteristics for the composition of each of the two bodies:

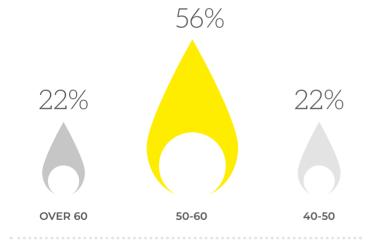
- 1. Independence
- 2. Independence
- 3. Training and professional experience
- 5. Age and seniority in office
- 6. Numbers

The Policy on the composition of the Corporate Bodies is published on the Company's website and described in the Report on corporate governance and ownership structure, in compliance with the provisions of art. 123-bis, (2), (d-bis) of the Consolidated Law on Finance.

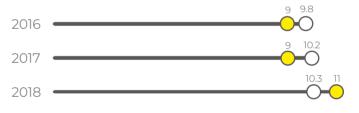
Average age of directors

Overall average age:

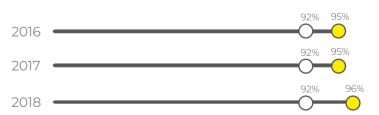
Sabaf 60 years old vs 56.4 years old Assonime



Number of meetings (2016-2018)



Average attendance at the Meetings (2016-2018) 8







Observations

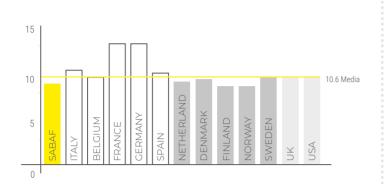
56% of the members of the Board in office are between 50 and 60 years old; the average age is slightly higher than the average of the Assonime sample (60 vs 56.4 years old).

In 2018, the Board of Sabaf met on 11 occasions (slightly above the Assonime average), with an average attendance rate of 96%. In general, the attendance of the Sabaf directors at the Board meetings in the last three years is greater than that of the Assonime panel.

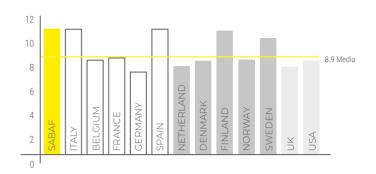
The meetings were attended by the Board of Statutory Auditors and occasionally - the managers of Sabaf, who were invited to attend and report on specific issues on the agenda.

⁸ Assonime panel including financial companies

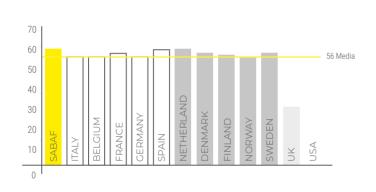
Average size of the BoD



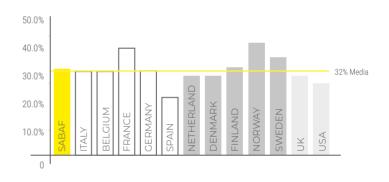
Average number of meetings of the BoD



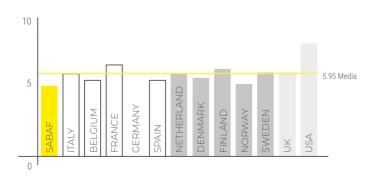
Average Age of Directors



% of Women in the BoD



Average number of Independent Directors



SABAF SOUTH EUROPE

NORTH EUROPE ANGLO-SAXON COUNTRIES

The comparison was carried out using the data provided by the 2018 Italia Board Index Observatory, published by Spencer Stuart, which analyses the characteristics and operation of the Boards of Directors of the top 100 listed Italian (industrial and financial) companies in order of capitalisation as of February 2018, as well as providing a comparison with the main European and non-European countries.

During the financial year, the Board of Directors carried out its assessment of the size, membership (including professional competences, managerial skills and seniority) and operation of the Board of Directors and its Committees, opting for the self-assessment of individual directors, coordinated by the Lead Independent Director.

The results of the assessment were generally positive, and were discussed at the Board of Directors' meeting of 23 January 2019.

BOARD OF STATUTORY AUDITORS

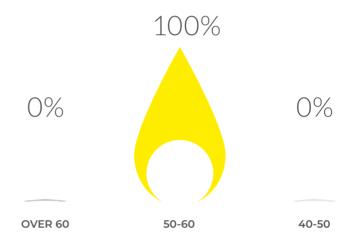
The Board of Statutory Auditors, appointed by the Shareholders' Meeting on 8 May 2018 for the period 2018 to 2020, is composed of 3 members⁹ with an average age of 52 years old (lower than the Assonime average, 55.9 years old). All members of the Board of Statutory Auditors are between 50 and 60 years old. The Chairman of the Board of Statutory Auditors is the expression of the minority list.



Age of statutory auditors

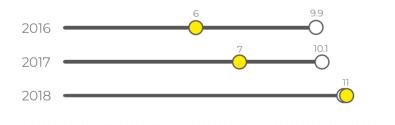
Overall average age:

Sabaf 52 years old vs 55.9 years old Assonime

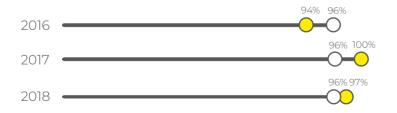


Overall average age: 52 years old

Number of meetings (2016-2018)



Average attendance at the Meetings (2016-2018)10







Observations

In line with the average of the Assonime sample, the Board of Statutory Auditors of Sabaf met 11 times in 2018.

The average attendance of members at meetings was 97% in the period 2016 to 2018 (97% in 2018), in line or higher than that of other listed companies of the research.

In general, the commitment of the Board of Statutory Auditors of Sabaf is achieved not only by carrying out checks and attending the periodic meetings required by law, but also by involving all members in the meetings of the Board of Directors and of the Control and Risk Committee, in the half-yearly collective meetings with the Control Bodies and individual meetings with the independent auditors.

 $^{^{9}\,}$ The Curriculum Vitae of each statutory auditor is available on the Company's website

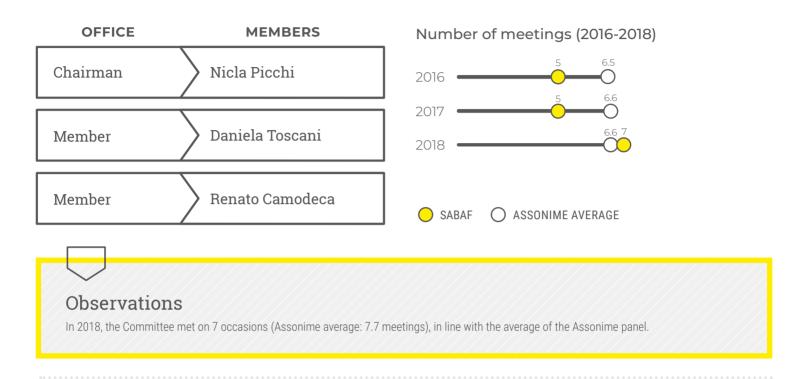
¹⁰ Assonime panel including financial companies.

CONTROL AND RISK COMMITTEE

The Control and Risk Committee currently in office, set up within the Board, is composed of 3 members, in line with the vast majority of cases in the Assonime sample (3 members, 76% in cases).

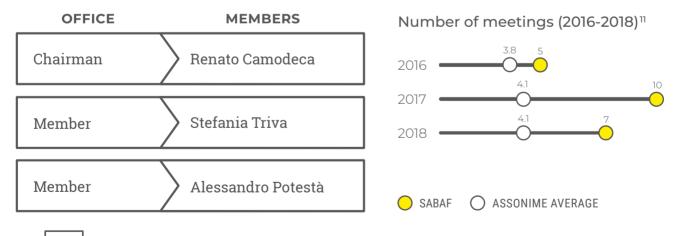
In line with the choice made by about 57% of the Assonime panel, the CRC of Sabaf is made up exclusively of independent directors.

The Committee was also assigned the functions pertaining to the Related-Party Committee.



REMUNERATION AND NOMINATION COMMITTEE

The Remuneration and Nomination Committee, set up within the Board, comprises three non-executive members, the majority of them independent (in line with the choice made by 43% of the Assonime panel), with the knowledge and experience in accounting, finance and remuneration policies that is deemed adequate by the Board of Directors.



Observations

In the last three years, the Committee met a number of times higher than the Assonime average.

In particular, in the last financial year the Committee met 7 times with the aim of, among other things, analysing the final results of the managerial incentive plan (MBO) for 2017 and preparing the plan for 2018, analysing the final results of the long-term incentive plan (LTI) for the three-year period 2015 to 2017 and preparing the regulations relating to the long-term incentive plan through the assignment of free shares ("Stock Grant Plan").

¹¹ Assonime panel referred only to the Remuneration Committee

GOVERNANCE OF SUSTAINABILITY

Sabaf has always believed that **social and environmental aspects** are an integral part of the Group's strategy and, as such, are the **responsibility of the Board of Directors.**

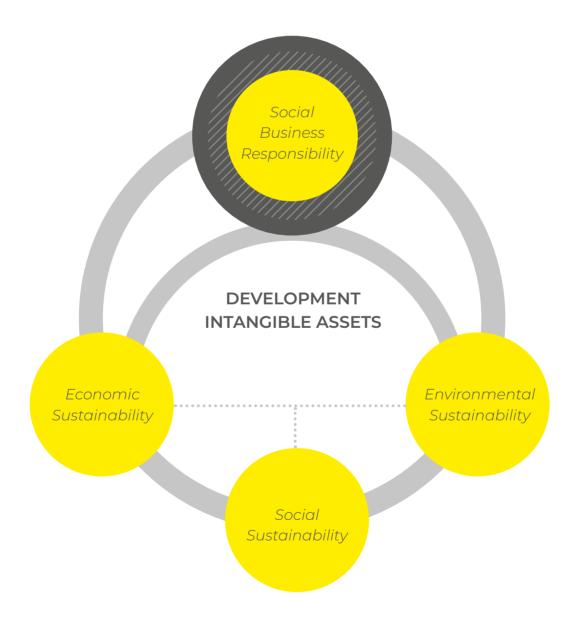
With reference to the governance of these topics, at the meeting of the Board of Directors on 3 August 2017, which, among other things, granted powers to executive directors following the appointment of the new Chief Executive Officer, it was confirmed that the criteria for implementing Corporate Social Responsibility ("CSR") are the responsibility of the Board itself.

In order to show the commitment with regard to sustainability issues, Sabaf S.p.A. has adopted a **Social Responsibility System in 2005 that complies with the international standard SA8000** and, also starting from that same year, Sabaf publishes its economic, social and environmental sustainability performance jointly in its Annual Report.

Within the SA 8000 Certified System, Sabaf S.p.A., in addition to having identified a Head of Social Responsibility Management System, created a **Social Performance Team (SPT)** made up of Representatives of the Social Responsibility Department and some Workers' Representatives for Social Responsibility, to whom the following tasks are also assigned:

- encourage a constant dialogue between the Workers and the Company Management;
- identify and assess the risks related to the aspects of Ethics and Social Responsibility;
- monitor the activities carried out in the workplace and check the implementation and effectiveness of the Social Responsibility System.

All Sabaf employees, as part of their responsibilities and competences, are required to implement CSR every day in the performance of their activities.



INTERNAL AUDIT AND SUPERVISORY BODY

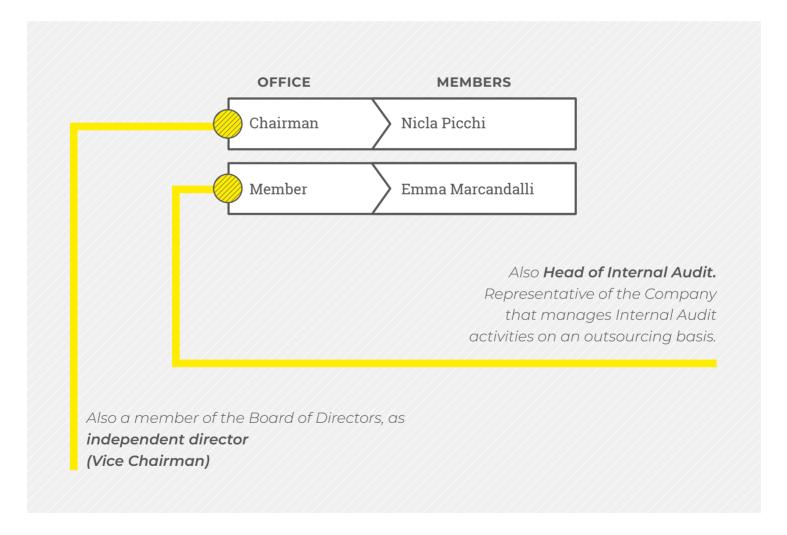
Internal Audit

On 8 May 2018, the Board of Directors, subject to the favourable opinion of the Control and Risk Committee, as well as after hearing the Board of Statutory Auditors, renewed the engagement of an independent external company, Protiviti s.r.l., to carry out the functions of the Internal Audit Department for the period from 2018 to 2020. It then identified Emma Marcandalli, the company's Managing Director, as Head of that department. This choice is related to the greater skills and efficiency that an external subject specialised in internal control issues can guarantee, also taking into account the size of the Sabaf Group.

The Head of the Internal Audit department is responsible for verifying that the internal control and risk management system is working properly. He/ She reports hierarchically to the Board of Directors and is not responsible for any operational areas and remains in office for the entire term of the Board that appointed him/her.

Supervisory Body

The appointment of the Supervisory Body was renewed on 8 May 2018 by the Board of Directors of Sabaf for the period 2018 to 2020; it is composed of a non-executive and independent member and an external member.



During 2018, the Supervisory Body of Sabaf met 5 times, asking the Company's management to attend the meetings in order to carry out in-depth analysis on specific aspects.

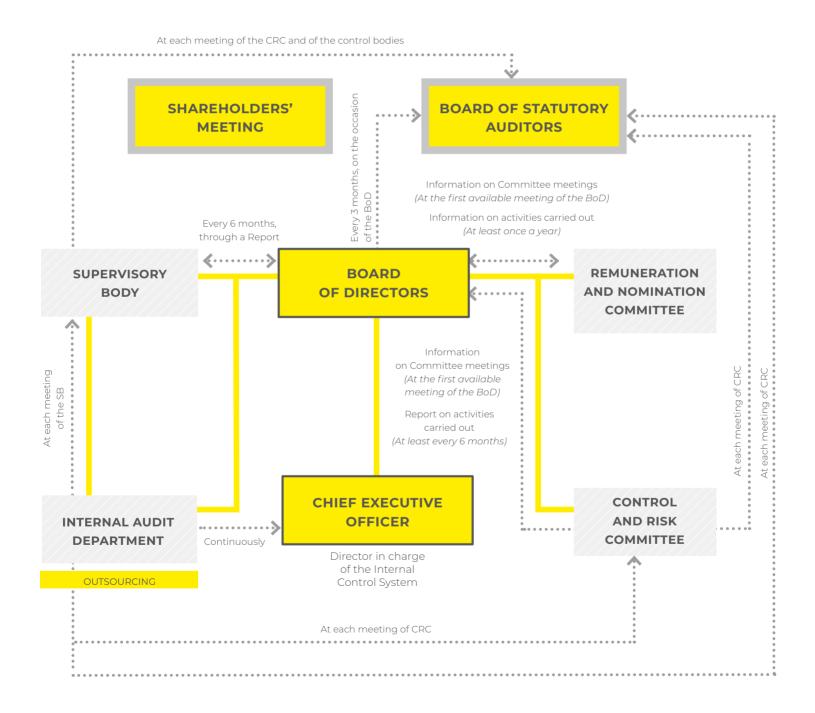
INFORMATION FLOWS

The administration and control model of Sabaf operates through a **network of periodic and systematic information flows** between the various corporate bodies.

Each body, according to the timing and methods defined by the Articles of

Association, the Governance Model and other internal documents, reports to the functionally superior body on the activities carried out in the reference period and those planned for the following period, any observations noted and suggested actions.

Information flows within the governance structure

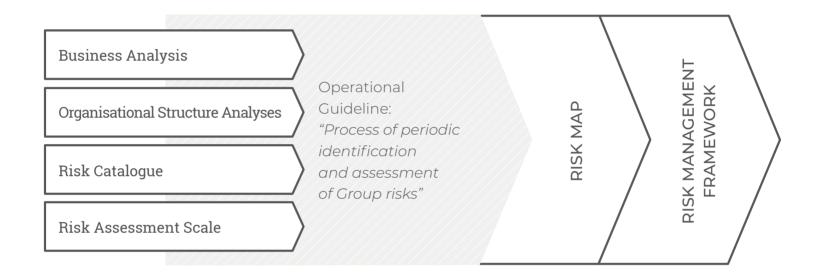


Risk Management

In the course of its business, Sabaf defines its strategic and operational objectives and identifies, assesses and manages risks that could prevent the achievement of these objectives.

In recent years, Sabaf has gradually moved closer to the concepts of risk assessment and risk management, developing a structured process of periodic identification, assessment and management of risks, defined and formalised in a Guideline of the Corporate Governance Manual.

The risk management process includes all the material aspects identified by the Group as part of the materiality analysis carried out in accordance with the provisions of the GRI Standards.



The Guidelines define the roles and responsibilities of the risk assessment and risk management processes, indicating the subjects to be involved, the frequency of the process and the assessment scales.

ASS	ESSMENT SCALES		(2)	3	(4)
	Economic-financial losses	< € 0.2 mil	€ 0.2 - € 0.5 mil	€ 0.5 - € 1.2 mil	> € 1.2 mil
IMPACT	HSE	Limited damage to health / safety / environment	Moderate damage to health / safety / environment	Serious damage to health / safety / environment	Very serious damage to health / safety / environment
MΕ	Reputational damage	Negligible impacts on stakeholder confidence	Moderate impacts on stakeholder confidence	Significant impacts on stakeholder confidence	Damaged stakeholder confidence
	Operational damage	No impact on business processes	Low impacts on efficiency / continuity	Significant impacts on efficiency / continuity	Critical impacts on efficiency / continuity
PROBABILITY	Frequency of occurrence	Once every 3 years or more	Once every 2 years	Once a year	Several times a year
PROBA	Quality indicators	Unlikely/ Remote	Not very likely	Likely	Very likely
RISK	RISK MANAGEMENT LEVEL Optimal		Adequate (with room for improvement)	To be strengthened	Nonexistent / lacking

Each risk is subject to an **assessment** that is broken down as follows:

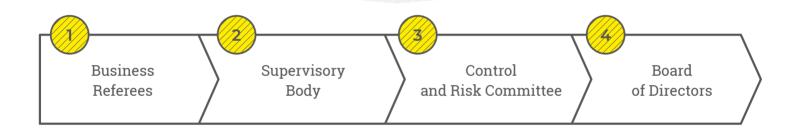
- probability of occurrence foreseeable over a three-year future time horizon;
- estimate of the average of the economic-financial impacts, HSE, reputational and operational damage, within the time frame being assessed;
- · level of risk management and control.

In the last quarter of 2018, the Internal Audit Department began the periodic risk assessment process for the identification and assessment of Group risks, with the broad involvement of certain Parent Company department heads, also in their capacity as representatives for the Subsidiaries, each for their respective areas.

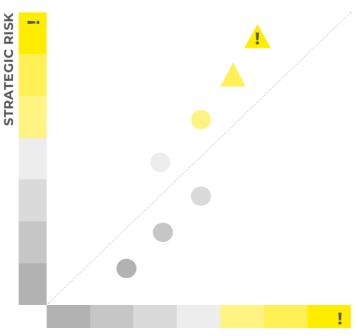
Along the assessment process, which also involves all the control bodies, the risks take shape and are positioned on the map.

Risk Assessment Process

Internal Audit



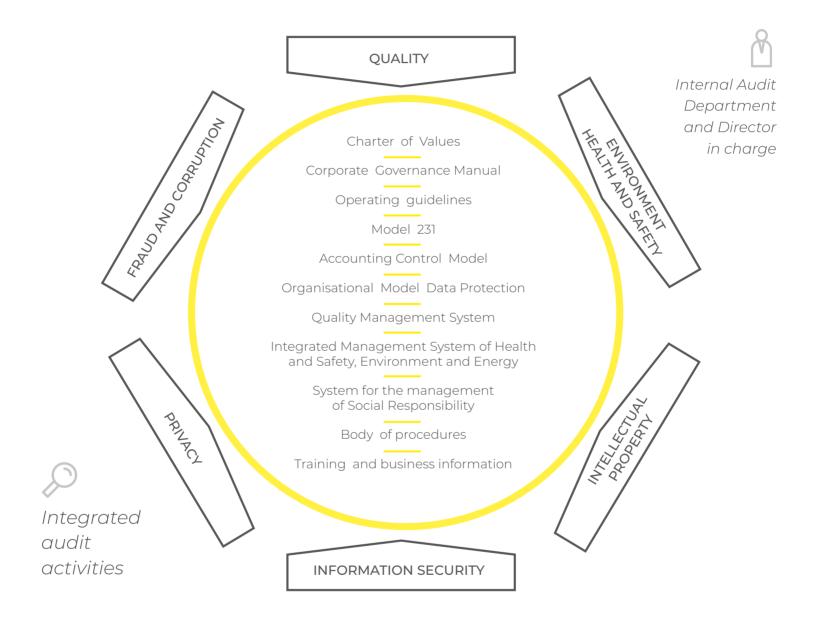
Risk Map



Compliance

INTEGRATED COMPLIANCE

Internal control system



The risk management activity carried out by Sabaf also takes into account compliance requirements in order to achieve the company's objectives. The internal control system is based on the following elements:

- organisation of the internal control and risk management system;
- procedures and mechanisms for the concrete implementation of the control principles;
- continuous verification and monitoring processes carried out at various levels of the organisation, both within the company processes and through independent structures.

In particular, Sabaf prepares an integrated and *risk-based Audit Plan, broken down according to specific control objectives* (operational risks, compliance risks with Law 262/2005, Legislative Decree 231/2001, GDPS, security of company information systems, etc.).

The execution of the interventions is assigned, in outsourcing, to a single structure, the Internal Audit, in turn responsible for reporting the results of the activities carried out to the competent control bodies.



ALL THIS TRANSLATES INTO AN INTEGRATED COMPLIANCE CULTURE AND TOOLS

Integrated compliance and the Corporate Governance Manual



Following compliance with the Corporate Governance Code for listed companies and in order to internalise the good governance practices sponsored in this document in its processes, Sabaf adopted a **Corporate Governance Manual**¹² that regulates principles, rules and operating procedures.

This Manual, adopted by Board resolution of 19 December 2006, has been updated several times over the years in order to reflect new laws and regulations in Corporate Governance, as well as best practices adopted by the Company over time.

The Manual includes some operating guidelines, also approved by the Board of Directors and updated from September 2018, prepared for the purpose of the correct carrying-out of the activities pertaining to Sabaf's management and control bodies.

OPERATING GUIDELINES

REGULATED SUBJECTS

SELF-ASSESSMENT OF THE BOD

MANAGEMENT, COORDINATION
AND CONTROL OF GROUP SUBSIDIARIES

MEANS OF COMPLIANCE WITH DISCLOSURE OBLIGATIONS TO STATUTORY AUDITORS PURSUANT TO ART. 150 OF THE TUF

ASSESSMENT OF THE GROUP'S INTERNAL CONTROL SYSTEM

PROCESS OF PERIODIC IDENTIFICATION AND ASSESSMENT OF GROUP RISKS

MANAGEMENT OF SIGNIFICANT OPERATIONS IN WHICH DIRECTORS HAVE AN INTEREST

ASSIGNMENT OF PROFESSIONAL MANDATES TO THE INDEPENDENT AUDITORS

Integrated compliance and Legislative Decree 231/2001

In 2006, Sabaf S.p.A. adopted the **Organisation, Management and Control Model, as suggested by Legislative Decree 231/2001**¹³, aimed at preventing the commission of specific types of offences by employees and/or collaborators in the interest or for the benefit of the Company.

In the following years, the Company, under the supervision of the Supervisory Body, promptly responded to the need to adapt the Model and the control structure to the regulatory changes that had occurred from time to time.

The Company entrusts the Supervisory Body with the task of assessing the adequacy of the Model itself, i.e. its real capacity to prevent offences as well as to supervise the operation and correct observance of the adopted protocols.

In 2008, the subsidiary Faringosi Hinges s.r.l. also adopted Model 231 and appointed the SB, ensuring, in line with the parent company, its proper updating and effective operation.



Activities carried out in 2018

SUPERVISORY BODY

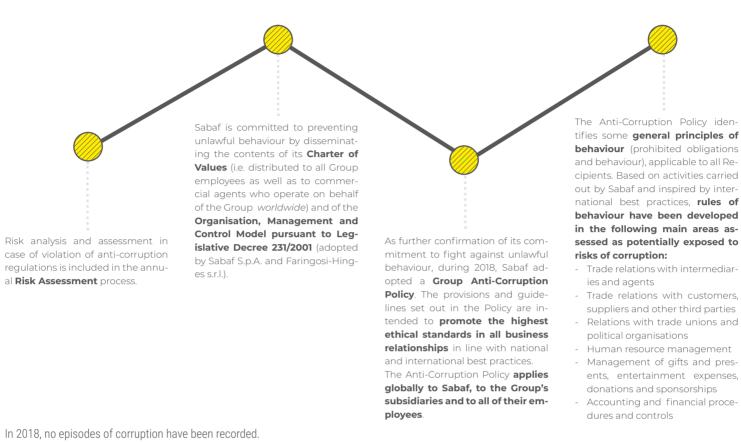
- Systematic **verifications** on the **effectiveness and operations of the Model**, both through checks carried out by Internal Audit and through conversations with personnel involved in sensitive activities.
 - Investigation activities regarding the occupational health and safety management processes.
 - Information and training for employees concerning specific protocols regulated by the Model.
 - In-depth analyses preparatory to the review and updating of the Model.

¹² The latest version of the document in accordance with the provisions of the Corporate Governance Code, approved by the Board of Directors on 25 September 2018, is available on the Company website, at www.sabaf.it under the Investors - Corporate Governance section

¹³ The latest version of the document, approved by the Board of Directors on 25 September 2018, available on the Company website, at www.sabaf.it under the Investors - Corporate Governance section

Integrated compliance and Anti-corruption

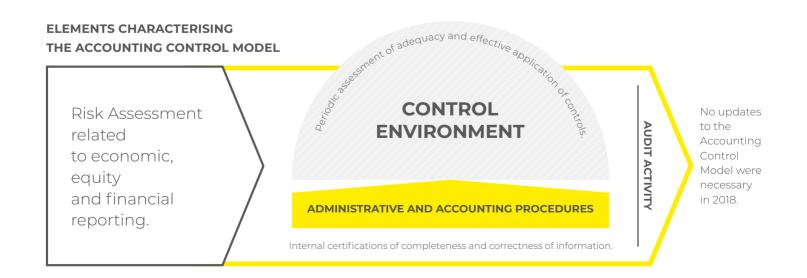
The Sabaf Group, aware of the negative effects of corrupt practices in business management, is committed to preventing and combating the occurrence of offences in the carrying-out of its activities.



Integrated Compliance and Law 262/2005

Sabaf considers the Internal Control and Risk Management System for financial information an integral part of its risk management system. In this regard, Sabaf has integrated the activities relating to the management of the internal control system on financial reporting into its Audit and Compliance process since 2008.

The Group defined its own Accounting Control Model, approved for the first time by the Board of Directors on 12 February 2008, subsequently revised and updated.



Sabaf and employees

Risks

The management of relations with the employees of the Sabaf Group cannot disregard the identification, assessment and management of potential risks. The relevant risk categories in this area are:

Strategic risks, which could affect the achievement of the Group's development objectives, such as the lack of adequate skills, the loss of key resources or the difficulty of replacing them.

Legal and compliance risks, related to contractual liabilities, compliance with the regulations applicable to the Group and the commitments set out in the Charter of Values, such as the correct application of labour contracts in force in the various countries in which the Group operates, health and safety regulations, compliance with the criteria of fairness and impartiality in the management of human resources.

Operational risks, which may lead to malfunctions in the carrying-out of current activities, such as high turnover or conflicting industrial relations.

In order to deal with these potential risks, the Group adopted certified systems for managing social responsibility (compliant with SA8000 standard) for the parent company Sabaf S.p.A. and managing occupational health and

safety (compliant with OHSAS 18001 standard) for Sabaf S.p.A. and Faringosi Hinges s.r.l., extending their principles and policies to all Group companies, in order to ensure increasingly coordinated and uniform management of aspects relating to relations with employees.

In this perspective, at the end of 2018, the Group's workforce included the position of Global Group HR Director.

Sabaf also implements structured policies in the following areas:

- · selection and recruitment of personnel;
- training
- · internal communication:
- remuneration and incentive systems;
- · company welfare;
- · industrial relations.

The combination of these systems and policies enables the Group to fully manage these risks. The following paragraphs outline, for each of these aspects, the characteristics of the "Sabaf model" and the performance achieved.

Personnel management policy

THE SOCIAL RESPONSIBILITY AND HEALTH AND SAFETY MANAGEMENT SYSTEM

The commitment of the Sabaf Group to social responsibility and the protection of workers' health and safety are strategic elements for Sabaf and the achievement of labour standards that guarantee respect for human rights, health and maximum safety is a constant challenge.

The Group is committed to pursuing the following objectives, which are also set out in the Charter of Values:

- promote respect for the fundamental human rights of workers in all countries
 where the Group operates, as identified in the principles established in the
 SA8000 standard, in the Global Compact and in the Code of Conduct of Ceced,
 relating to child labour, forced and compulsory labour, occupational health and
 safety, freedom of association and right to collective bargaining, discrimination, disciplinary procedures, working hours and remuneration criteria;
- carry out their activities by creating a group of motivated people who can
 operate in a work environment that encourages and rewards fairness and
 respect for others;
- produce profits without ever losing sight of the respect for the rights of its workers:
- identify and analyse potential hazards and risks in business processes, in order to make workplaces safer and more comfortable;
- avoid any form of discrimination and favouritism during the recruitment phase of personnel, whose selection must be made on the basis of the applicants' profiles meeting the company's requirements;
- value and respect diversity, avoiding any form of discrimination in career advancement on the grounds of gender, sexual orientation, age, nationality,

state of health, political opinions, race and religious beliefs at all stages of the employment relationship;

- adopt criteria of merit and competence in employment relationships, based also on the achievement of collective and personal objectives;
- · avoid all forms of mobbing of workers;
- enhance the contribution of human capital in decision-making processes, encouraging continuous learning, professional growth and knowledge sharing;
- provide clear and transparent information on the tasks to be carried out and the position held, the performance of the Group and market developments;
- establish a responsible and constructive dialogue with trade unions, fostering a climate of mutual trust in compliance with the principles of fairness and transparency, respecting their roles.

For this reason, Sabaf S.p.A. adopted and maintains a Social Responsibility Management System that, by integrating with the other management systems operating in the company (health, safety, environment and energy and quality), constitutes an effective means for constant risk reduction. This objective is achieved through the following instruments:

- maintaining full compliance with applicable laws, directives, local regulations and other signed requirements (SA8000, Global Compact, Code of Conduct of Ceced);
- the full implementation of the Charter of Values;
- · the prior assessment of human rights, health and safety aspects;
- the development of a process based on people being given a sense of responsibility within shared rules of behaviour.

Sabaf S.p.A. and the SA8000 Standard

Sabaf S.p.A. has been using a Social Responsibility Management System certified and compliant with the SA8000 standard since March 2009. On 21 May 2018, the Company obtained the renewal of the Certification from IMQ.

In order that the main stakeholders can actively participate in the implementation of the Social Responsibility System, particular attention was paid to their involvement in the methods described below.

To Sabaf S.p.A. workers through specific training sessions. Understanding the importance of adopting a Social Responsibility System is also facilitated by sharing information material on company electronic noticeboards, on the HR PORTAL workers' portal, on the network and on the company website.

To the trade unions: through awareness and the convinced involvement of trade union workers' representatives is fundamental for the full implementation of the System.

To suppliers, sub-suppliers and sub-contractors, through the sign-

ing of a commitment to comply with the requirements of the Standard, an integral part of contracts. Audits are also carried out on suppliers.

To customers, by committing themselves within the household appliance industry to support ethical and fair behaviour, also through compliance with the code of conduct of CECED.

To the institutions, through the commitment to carry out its activities in order to overcome mere compliance with the law.

To the community: complying with the Global Compact, the United Nations initiative for companies that commit to upholding and promoting the ten principles: human rights, labour, environmental protection and anti-corruption.

To be eligible for SA8000 compliance, Sabaf S.p.A. must comply with local, national and other applicable laws, prevailing industry standards, other requirements it complies with, and the principles of many international instruments, including the Universal Declaration of Human Rights, ILO Conventions and United Nations Conventions.

During 2018, no episodes of discrimination were observed at Group level.

Through the process envisaged by the SA8000 standard, with regard to Sabaf S.p.A., no transactions/activities with a high risk of recourse to child labour and forced or compulsory labour or with a high risk of violation of the right of workers to exercise their freedom of association and collective bargaining were identified.

With regard to this last aspect of risks related to suppliers, the SA8000 process involves carrying out a risk analysis and providing a questionnaire for suppliers that include the issue of freedom of association and collective bargaining (for further information, refer to the chapter "The SA8000 standard and suppliers").

With regards to the other Group companies, there are no structured assessment tools

The people of the Sabaf Group

The Sabaf Group had 760 employees at 31 December 2018 compared to 756 at the end of 2017 (+0.53%).

	3	31.12.201	8	3	31.12.201	7	3	31.12.201	6
	ô	Q	69	ô	ç	69	ô	Ç	69
Sabaf S.p.A. (Ospitaletto, Brescia - Italy)	329	174	503	337	177	514	353	180	533
Faringosi Hinges S.r.l. (Bareggio, Milan - Italy)	22	21	43	22	21	43	21	21	42
A.R.C. s.r.l. ¹⁴ (Campodarsego, Padua - Italy)	15	4	19	14	4	18	-	-	-
Sabaf do Brasil (Jundiaí - São Paulo - Brazil)	70	17	87	61	16	77	49	17	66
Sabaf Turkey (Manisa - Turkey)	64	36	100	56	40	96	52	34	86
Sabaf Appliance Components (Kunshan) Co., Ltd. (Kunshan, Jiangsu Province – China)	6	2	8	6	2	8	7	2	9
GROUP TOTAL	506	254	760	496	260	756	482	254	736

¹⁴ Figures consolidated starting from 2017

As regards the types of contract adopted, there are 734 employees with permanent contracts (97.1%) and 26 with fixed-term contracts and in cross training or apprenticeship (3.4%).

	:	31.12.201	8	3	31.12.201	7	3	31.12.201	6
SABAF S.P.A.	ô	Ç	69	ô	Ç	69	ô	Ç	69
Permanent	326	171	497	335	177	512	350	180	530
Cross training or apprenticeship	2	1	3	1	0	1	3	0	3
Fixed term	1	2	3	1	0	1	0	0	0

	3	31.12.201	8	3	31.12.201	7	3	31.12.201	6
FARINGOSI HINGES S.R.L.	ô	9	6 9	ô	ç	69	ô	Q	69
Permanent	22	21	43	22	21	43	21	21	42
Cross training or apprenticeship	0	0	0	0	0	0	0	0	0
Fixed term	0	0	0	0	0	0	0	0	0

	3	31.12.2018			31.12.2017			31.12.2016		
A.R.C. S.R.L.	ô	9	69	ô	ç	69	ô	9	6 9	
Permanent	15	4	19	14	4	18	N/A	N/A	N/A	
Cross training or apprenticeship	0	0	0	0	0	0	N/A	N/A	N/A	
Fixed term	0	0	0	0	0	0	N/A	N/A	N/A	

	31.12.2018		31.12.2017			31.12.2016			
SABAF DO BRASIL	ô	9	69	ô	ç	69	ô	Q	69
Permanent	70	17	87	58	16	74	49	17	66
Cross training or apprenticeship	0	0	0	0	0	0	0	0	0
Fixed term	0	0	0	3	0	3	0	0	0

	3	31.12.201	8	3	31.12.201	7	3	31.12.201	6
SABAF TURKEY	ô	ç	69	ô	ç	69	ô	Q	69
Permanent	51	32	83	41	29	70	43	31	74
Cross training or apprenticeship	0	0	0	0	0	0	0	0	0
Fixed term	13	4	17	15	11	26	9	3	12

	3	31.12.201	8	3	31.12.201	7	3	31.12.201	6
SABAF CHINA	ô	9	6 9	ô	ç	69	ô	Q	69
Permanent	3	2	5	3	2	5	1	2	3
Cross training or apprenticeship	0	0	0	0	0	0	0	0	0
Fixed term	3	0	3	3	0	3	6	0	6

	3	31.12.201	8	3	31.12.201	7	3	31.12.201	6
GROUP TOTAL	ô	ç	69	ô	ç	69	ô	9	69
Permanent	487	247	734	473	249	722	464	251	715
Cross training or apprenticeship	2	1	3	1	0	1	3	0	3
Fixed term	17	6	23	22	11	33	15	3	18
	506	254	760	496	260	756	482	254	736

Temporary personnel (with temporary work contract or similar)



ANNUAL AVERAGE

2018

In 2018, 9 former temporary workers were hired by the companies of the Sabaf Group (4 in 2017).

In 2018, Sabaf S.p.A. and A.R.C. s.r.l. hosted all-in-all 15 young people in internships (5 in 2017), including 7 students attending secondary school. In this way, they are offered a first direct contact with the world of work: in this way, they can see the technical knowledge acquired in the classroom applied "on the job".

Breakdown of personnel by age

31.12.2018 31.12.2017 < 30 years old 13.9% 16.0% 31 – 40 years old 39.9% 40.5% 41 - 50 years old 31.8% 30.7% 14.4% over 50 years old 12.8% TOTAL 100% 100%

The low average age of Group employees (39.7 years old) confirms the strategy of hiring young workers, giving priority to training and internal growth rather than acquiring skills from outside, also in consideration of the specific nature of Sabaf's industrial model.

The minimum age for Group personnel is 22 years old for Italy, 21 years old for Turkey, 18 years old for Brazil and 29 years old for China.

Breakdown of the personnel by length of service

	31.12.2018	31.12.2017
< 5 years	26.7%	24.5%
6 – 10 years	12.9%	18.9%
11 – 20 years	46.7%	45.1%
over 20 years	13.7%	11.5%
TOTAL	100%	100%

Sabaf is aware of the fundamental importance of having a stable and qualified workforce that is a key factor in maintaining its competitive advantage.

Breakdown by department

		2018					2017			
AREA	ô	Q.		69		ô	Ŷ	69		
Production	289	158		447		301	172	473		
Quality	51	31		82		42	32	74		
Research and development	65	1		66		66	2	68		
Logistics	33	7		40		26	0	26		
Administration	9	27		36		10	25	35		
Sales	10	12		22		8	12	20		
Services	31	10		41		17	11	28		
Purchases	8	5		13		8	4	12		
Other	10	3		13		18	2	20		
TOTAL	506	254		760		496	260	756		

Recruitment policy

In order to attract the best resources, the recruitment policy aims to ensure equal opportunities for all candidates, avoiding any kind of discrimination. The selection procedure requires, inter alia:

- the selection process to be carried out in at least two stages with two different contacts;
- that at least two applicants be assessed for each position.

The assessment of the applicants is based on their skills, training, previous experience, expectations and potential, tailoring them to the specific needs of the company.

All new employees of the Group are given the Charter of Values. Sabaf S.p.A. also delivers a copy of the SA8000:2014 standard, for which the company is certified.

Breakdown by qualification

		20)18		2017				
QUALIFICATION	ô	9	6 9		ô	9	\$9		
Degree	74	33	107	14.1%	64	29	93	12.3%	
High school leaving diploma	257	89	346	45.5%	248	92	340	45.0%	
Middle school leaving certificate	174	131	305	40.1%	180	134	314	41.5%	
Elementary school leaving certificate	1	1	2	0.3%	4	5	9	1.2%	
TOTAL	506	254	760	100%	496	260	756	100%	

Change in personnel in 2018

	31.12.17		NEW EMPLOYEES		VING OYEES	PROMO-	31.12.18	
SABAF S.P.A.	31.12.17	ô	Ŷ	ô	Ŷ	TIONS		
Managers	10	0	1	0	1	0	10	
White collars and Middle Managers	110	6	4	4	1	2	117	
Blue collars and equivalent	394	0	0	10	6	-2	376	
TOTAL	514	6	5	14	8	0	503	

	31.12.17	NE EMPLO	W DYEES		VING OYEES	PROMO-	31.12.18	
A.R.C. S.R.L.	31.12.17	ô	9	ô	9	TIONS		
Managers	0	0	0	0	0	0	0	
White collars and Middle Managers	4	0	0	1	0	0	3	
Blue collars and equivalent	14	2	0	0	0	0	16	
TOTAL	18	2	0	1	0	0	19	

	31.12.17	NEW EMPLOYEES		LEA\ EMPL		PROMO-	31.12.18
SABAF TURCHIA	31.12.17	ô	ç	ô	9	TIONS	31.12.10
Managers	3	0	0	0	0	0	3
White collars and Middle Managers	15	4	1	1	2	0	17
Blue collars and equivalent	78	28	12	23	15	0	80
TOTAL	96	32	13	24	17	0	100

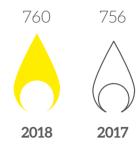
	31.12.17	ı	NEW EMPLOYEES		/ING OYEES	PROMO-	31.12.18	
FARINGOSI HINGES S.R.L.	31.12.17	ô	ç	ô	9	TIONS	02.10	
Managers	1	0	0	0	0	0	1	
White collars and Middle Managers	13	0	0	0	0	0	13	
Blue collars and equivalent	29	0	0	0	0	0	29	
TOTAL	43	0	0	0	0	0	43	

	31.12.17	NE EMPL			/ING OYEES	PROMO-	31.12.18
SABAF DO BRASIL	31.12.17	ô	9	ô	9	TIONS	31.12.10
Managers	0	0	0	0	0	0	0
White collars and Middle Managers	10	0	0	0	0	0	10
Blue collars and equivalent	67	30	2	21	1	0	77
TOTAL	77	30	2	21	1	0	87

	31.12.17	l .	NEW EMPLOYEES		VING OYEES	PROMO-	31.12.18
SABAF CINA	31.12.17	ô	9	ô	ç	TIONS	31.12.10
Managers	1	0	0	0	0	0	1
White collars and Middle Managers	6	0	0	0	0	0	6
Blue collars and equivalent	1	0	0	0	0	0	1
TOTAL	8	0	0	0	0	О	8

Ν°

	31.12.17	NEW EMPLOYEES		LEAVING EMPLOYEES		PROMO-	31.12.18
GROUP TOTAL	31.12.17	ô	Q.	ô	Ç	TIONS	31.12.10
Managers	15	0	1	0	1	0	15
White collars and Middle Managers	158	10	5	6	3	2	166
Blue collars and equivalent	583	60	14	54	22	-2	579
TOTAL	756	70	20	60	26	0	760



New employees by age group and gender

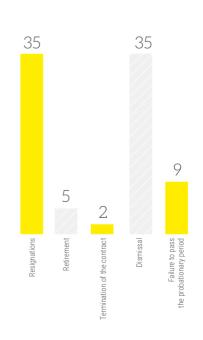
		2018		2017		
DESCRIPTION	ô	Q.	6 9	ô	ç	69
up to 20 years old	2	0	2	5	2	7
from 21 to 30 years old	22	11	33	32	13	45
from 31 to 40 years old	41	8	49	24	13	37
from 41 to 50 years old	4	0	4	7	2	9
over 50 years old	1	1	2	2	1	3
TOTAL	70	20	90	70	31	101

Resigned during the year by age group and gender

		2018				2017		
DESCRIPTION	ô	Q.	6 9		ô	ç	\$9	
up to 20 years old	3	0	3		2	2	4	
from 21 to 30 years old	31	7	38		23	7	30	
from 31 to 40 years old	17	13	30		24	17	41	
from 41 to 50 years old	6	2	8		12	1	13	
over 50 years old	3	4	7		9	2	11	
TOTAL	60	26	86		70	29	99	

Reasons for terminating employment in 2018

DESCRIPTION	MANAGERS - WHITE COLLARS AND MIDDLE MANAGERS	BLUE COLLARS	TOTAL	
Resignations	8	27	35	
Retirement	1	4	5	
Termination of the contract	0	2	2	
Dismissal	2	33	35	
Failure to pass the probationary period	0	9	9	
TOTAL	11	75	86	



Leaving turnover rate by geographical area, age group and gender 15

ITALY (SABAF, FARINGOSI AND A.R.C.)	2018			2017			
DESCRIPTION	ô	Q	6 9	ô	Ŷ	69	
< 30 years old	0.54%	0.00%	0.35%	0.54%	0.00%	0.35%	
from 31 to 40 years old	1.63%	1.52%	1.59%	2.68%	0.99%	2.09%	
from 41 to 50 years old	1.09%	0.51%	0.88%	1.61%	0.00%	1.04%	
over 50 years old	0.27%	0.51%	0.35%	1.07%	0.00%	0.70%	
TOTAL	3.54%	2.53%	3.19%	5.90%	0.99%	4.18%	

BRAZIL		2018		2017			
DESCRIPTION	ô	9	69	ô	Ŷ	6 9	
< 30 years old	17.14%	0.00%	13.79%	9.84%	18.75%	11.69%	
from 31 to 40 years old	7.14%	5.88%	6.90%	6.56%	12.50%	7.79%	
from 41 to 50 years old	2.86%	0.00%	2.30%	3.28%	0.00%	2.60%	
over 50 years old	0.00%	0.00%	0.00%	1.64%	0.00%	1.30%	
TOTAL	27.14%	5.88%	22.99%	21.32%	31.25%	23.38%	

TURKEY		2018		2017			
DESCRIPTION	ô	Q	6 9	ô	Ŷ	6 9	
< 30 years old	28.13%	19.44%	25.00%	30.36%	15.00%	23.96%	
from 31 to 40 years old	9.38%	25.00%	15.00%	17.86%	32.50%	23.96%	
from 41 to 50 years old	0.00%	2.78%	1.00%	5.36%	2.50%	4.17%	
over 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
TOTAL	37.50%	47.22%	41.00%	53.58%	50.00%	52.09%	

CHINA		2018			2017			
DESCRIPTION	ô	ç	6 9	ô	Ŷ	6 9		
< 30 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
from 31 to 40 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
from 41 to 50 years old	0.00%	0.00%	0.00%	16.67%	0.00%	12.50%		
over 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
TOTAL	0.00%	0.00%	0.00%	16.67%	0.00%	12.50%		

GROUP TOTAL		2018		2017			
DESCRIPTION	ô	9	69	ô	Ŷ	69	
< 30 years old	6.32%	2.76%	5.13%	5.04%	3.46%	4.50%	
from 31 to 40 years old	3.36%	5.12%	3.95%	4.84%	6.54%	5.42%	
from 41 to 50 years old	1.19%	0.79%	1.05%	2.42%	0.38%	1.72%	
over 50 years old	0.20%	0.39%	0.26%	1.01%	0.00%	0.66%	
TOTAL	11.07%	9.06%	10.39%	13.31%	10.38%	12.30%	

In 2018, turnover was further reduced compared to 2017 and remained at satisfactory levels.

At Sabaf Turkey, the Group is experiencing the greatest difficulties in personnel retention, partly because it operates in an area, Manisa, which is experiencing strong industrial development and where new employment opportunities are constantly being offered. The policies on personnel implemented have nevertheless led to a higher level of retention development in Turkey.

¹⁵ The calculation of the turnover rate considers the employees at 31 December 2018 as the denominator. Retirement and fixed term contracts are excluded for the purposes of the calculation

Entry turnover rate by geographical area, age group and gender 16

ITALY (SABAF, FARINGOSI AND A.R.C.)	2018			2017			
DESCRIPTION	ô	Ŷ	69	ô	Ŷ	6 9	
< 30 years old	1.09%	1.01%	1.06%	0.27	0.00%	0.17%	
from 31 to 40 years old	0.55%	1.01%	0.71%	1.61%	0.00%	1.04%	
from 41 to 50 years old	0.27%	0.00%	0.18%	0.54%	0.00%	0.35%	
over 50 years old	0.27%	0.50%	0.35%	0.54%	0.50%	0.52%	
TOTAL	2.19%	2.51%	2.30%	2.95%	0.50%	2.09%	

BRAZIL		2018		2017			
DESCRIPTION	ô	ç	ô ?	ô	ç	6 9	
< 30 years old	2.86%	5.88%	3.45%	26.23%	25.00%	25.97%	
from 31 to 40 years old	38.57%	5.88%	32.18%	11.48%	0.00%	9.09%	
from 41 to 50 years old	1.43%	0.00%	1.15%	3.28%	0.00%	2.60%	
over 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
TOTAL	42.86%	11.76%	36.78%	40.98%	25.00%	37.66%	

TURKEY		2018		2017		
DESCRIPTION	ô	Ŷ	69	ô	Ŷ	89
< 30 years old	28.13%	22.22%	26.00%	35.71%	27.50%	32.29%
from 31 to 40 years old	18.75%	13.89%	17.00%	19.64%	32.50%	25.00%
from 41 to 50 years old	3.13%	0.00%	2.00%	5.36%	5.00%	5.21%
over 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL	50.00%	36.11%	45.00%	60.71%	65.00%	62.50%

CHINA		2018			2017			
DESCRIPTION	ô	9	69	ô	Ŷ	89		
< 30 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
from 31 to 40 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
from 41 to 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
over 50 years old	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
TOTAL	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		

GROUP TOTAL		2018		2017			
DESCRIPTION	ô	Ŷ	69	ô	Ŷ	69	
< 30 years old	4.74%	4.33%	4.61%	7.46%	5.77%	6.88%	
from 31 to 40 years old	8.10%	3.15%	6.45%	4.84%	5.00%	4.89%	
from 41 to 50 years old	0.79%	0.00%	0.53%	1.41%	0.77%	1.19%	
over 50 years old	0.20%	0.39%	0.26%	0.40%	0.38%	0.40%	
TOTAL	13.83%	7.87%	11.84%	14.11%	11.92%	13.36%	

¹⁶ The calculation of the turnover rate considers the employees at 31 December 2018 as the denominator

Personnel training

Within the Sabaf Group, the professional growth of employees is supported by continuous training.

The Group Human Resources Department, having consulted the relevant heads and gathered the training requirements, prepares an annual training plan on the basis of which the specific courses to be carried out are planned.

		2018			2017		
(hours)	ô	9	69	ô	9	69	
Training for new employees, apprentices, training contracts	4,363	1,299	5,662	5,173	1,538	6,711	
Information systems	51	55	105	309	26	335	
Technical Training	2,070	649	2,719	467	69	536	
Quality, safety, environment, energy and social responsibility	3,649	1,040	4,689	2,905	540	3,445	
Administration and organisation	724	554	1,278	1,246	389	1,635	
Foreign languages	1,339	420	1,759	328	152	480	
Lean Philosophy/Production/Office	16	-	16	1,522	364	1,886	
Other	240	496	736	-	-	-	
TOTAL HOURS OF TRAINING RECEIVED	12,452	4,513	16,963	11,950	3,078	15,028	
Hours of training provided by internal trainers	7,239	1,915	9,154	4,501	1,282	5,783	
TOTAL	19,691	6,428	26,119	16,451	4,360	20,811	

The hours provided by internal trainers also include training given to employees with temporary work contract (equal to 6,571 hours in 2018).

Hours of training per capita received by category

	2018			2017		
	ô	Ç	69	ô	Ç	69
Blue Collars	23.7	15.2	20.8	20.5	8.8	16.5
White collars and Middle Managers	29.8	24.4	27.9	36.1	22.2	31.1
Managers	16.2	51.5	18.5	28.7	50	30.1
TOTAL	24.8	17.5	22.3	23.9	11.9	19.8

In 2018, the total cost incurred for training activities of Group personnel was approximately \notin 497,000 (approximately \notin 428,000 in 2017). In addition, there are training costs for temporary personnel, which in 2018 were around \notin 134,000 (around \notin 75,000 in 2017).

Internal Communication

With the aim of developing a dialogue and continuous involvement between the company and its collaborators, Sabaf organises meetings and sharing sessions in which the results of projects to improve quality, efficiency and productivity are presented, as well as current initiatives in the "industry 4.0" sector.

For example, in 2018, Sabaf S.p.A. organised two meetings in which a total of 256 employees took part; Sabaf Turkey organised two meetings in which all personnel took part.

The HR representatives provide assistance to all Group employees on matters relating to the employment relationship.

Sabaf S.p.A. and Faringosi Hinges s.r.l. have an HR PORTAL software, through which each worker, with personalised access, can consult the documents and information published by the company (payrolls, tax and social security data, etc.). Collective communications and agreements in favour of employees are also available.

The focus on internal communication uses, among other things, advanced tools that can reach all employees, such as wireless network and bulletin boards.

Systematic meetings in the various departments promote communication and involvement of personnel.

Diversity and equal opportunities

Sabaf is constantly committed to ensuring equal opportunities for women employees, who currently represent 33.4% of the workforce (34.4% in 2017). The Group, in accordance with the organisational and production requirements, is attentive to the family requirements of its employees. To date, most of the demands for reduced working time made by workers have been met. In 2018, there were a total of 48 part-time contracts (6 female employees, 40 female

workers, 1 male employee and 1 male worker), equal to 6.3% of the total (44 contracts in 2017: 5 female employees, 38 female workers, 1 male worker; 34 contracts in 2016: 2 female employees, 31 female workers and 1 male worker). 31 disabled people, 17 of whom are part-time, work in the Group's Italian companies. There are 7 agreements with a business co-operative for the placement of personnel belonging to protected categories.

Percentage distribution of employment by gender

	20	18	2017		
	Number	%	Number	%	
Men	506	66.6	496	65.6	
Women	254	33.4	260	34.4	
TOTAL	760	100	756	100	

Breakdown by category and gender

		2018			2017		
(%)		ô	Ç	6 9	ô	Q	\$9
Managers	< 30 years old	0	0	0	0	0	0
	from 31 to 40 years old	0	0	0	0	0	0
	from 41 to 50 years old	1	0	1	1	0	1
	over 50 years old	1	0	1	1	0	1
	Total	2	0	2	2	0	2
White collars and Middle Managers	< 30 years old	2	2	4	1	2	3
	from 31 to 40 years old	5	3	8	5	3	8
	from 41 to 50 years old	5	2	7	5	2	7
	over 50 years old	2	1	3	2	1	3
	Total	14	8	22	13	8	21
Blue-collars and equivalent	< 30 years old	8	2	10	10	3	13
	from 31 to 40 years old	21	11	32	20	12	32
	from 41 to 50 years old	14	10	24	14	9	23
	over 50 years old	8	2	10	7	2	9
	Total	51	25	76	51	27	77
Total	< 30 years old	10	4	14	12	4	16
	from 31 to 40 years old	26	14	40	25	15	40
	from 41 to 50 years old	20	12	32	19	12	31
	over 50 years old	11	3	14	10	3	13
	Total	67	33	100	66	34	100

The managers of all Group offices come from a geographical area close to the registered offices in which they operate, with the exception of the production manager at the premises of Sabaf China, who has been living in China for many years.

Non-EU workers 17

	2018	2017	BENCHMARK 18
Non-EU workers	19	24	-
Percentage over total workers	3.3%	4.1%	3.10%

At 31 December 2018, the Group's Italian companies included employees of 11 different nationalities.

Working hours and hours of absence

The normal weekly working time is 40 hours for the Italian companies and for Sabaf China and 44 hours for Sabaf do Brasil, spread over 5 working days, from Monday to Friday. For Sabaf Turkey, the duration is 45 hours per week, spread over 6 working days.

	20	2018		17	BENCHMARK 19	
OVERTIME	White Collars	Blue Collars	White Collars	Blue Collars	White Collars	Blue Collars
Average number of employees who have worked overtime per month	148	396	137	390	-	-
Number of overtime hours	16,598	37,016	12,946	31,622	-	-
Number of hours per capita per year 20	100	64	82	54	54	66

	2018				2017		BENCHMARK ²¹
TOTAL HOURS OF ABSENCE	ô	Ç	3 9	ô	2	\$ 9	BENCHMARK
Total hours of absence per year	27,938	43,409	71,347	29,274	42,621	71,895	-
Average hours of absence per capita	54.8	170.6	93.4	57.8	163.4	93.7	99.3

		2018			2017	
ABSENTEEISM RATE (HOURS OF ABSENCE OVER HOURS WORKED)	ô	Ç	\$9	ô	Ç	69
Italy	3.2%	8.5%	4.9%	3.5%	9.0%	5.3%
Brazil	1.3%	6.4%	2.3%	0.0%	1.3%	0.3%
Turkey	1.7%	11.3%	5.4%	1.9%	9.0%	4.8%
China	0.5%	0.0%	0.4%	0.3%	0.1%	0.3%
GROUP TOTAL	2.7%	8.8%	4.7%	2.8%	8.4%	4.6%

	2018			2017			DENCHMA DIZ 22
HOURS OF SICK LEAVE	ô	Ç	6 9	ô	Ç	\$ 9	BENCHMARK 22
Total annual hours of illness	21,033	21,104	42,137	19,019	19,679	38,697	-
Percentage of hours of illness over hours worked	2.0%	4.3%	2.8%	1.8%	3.9%	2.5%	-
Hours of sick leave per capita	41.3	82.9	55.2	37.6	75.4	50.5	44.3

		2018			2017		
HOURS OF MATERNITY LEAVE	ô	Q	6 9	ô	Q	\$9	BENCHMARK ²³
Total annual hours of maternity/paternity leave	4,813	21,707	26,520	7,941	22,346	30,287	-
Percentage of maternity hours over hours worked	0.5%	4.4%	1.7%	0.8%	4.4%	2.0%	-
Hours of maternity leave per capita	9.4	85.3	34.7	15.7	85.7	39.5	16.3

The high number of hours of maternity leave compared to the industry average reflects a higher percentage of female personnel.

 $^{^{\}rm 17}\,$ The figure refers exclusively to the Italian companies of the Group.

¹⁸ FEDERMECCANICA, L'industria metalmeccanica in cifre (June 2018) – Lavoratori extracomunitari (2014) http://www.federmeccanica.it

¹⁹ FEDERMECCANICA, L'industria metalmeccanica in cifre (June 2018) – Ore pro-capite di lavoro straordinario (2016), http://www.federmeccanica.it

 $^{^{\}mbox{\scriptsize 20}}\,$ in relation to the average number of employees

²¹ Processing by FEDERMECCANICA, *L'industria metalmeccanica in cifre (June 2018) – Ore pro-capite di assenza dal lavoro (2016)*, http://www.federmeccanica.it

²² FEDERMECCANICA, L'industria metalmeccanica in cifre (June 2018) – Ore pro-capite di assenza dal lavoro (2016), http://www.federmeccanica.it.

²³ FEDERMECCANICA, *L'industria metalmeccanica in cifre* (June 2018) – Ore pro-capite di assenza dal lavoro (2016), http://www.federmeccanica.it

		2018				201	7
PARENTAL LEAVES	ô	Ç	ô ?	ô	ç	6 9	% OF WORKERS IN THE WORKFORCE AFTER 12 MONTHS
TYPE OF LEAVE							
Compulsory maternity leave	0	19	19	0	15	15	80%
Early Maternity leave	0	8	8	0	9	9	78%
Voluntary maternity/paternity leave	10	18	28	12	22	34	65%
Breastfeeding	2	8	10	1	11	12	100%
Care for disabled family members (Law 104)	19	9	28	21	10	31	94%
OTHER LEAVES							
Blood donation	7	1	8	12	2	14	71%
Leave of absence	2	2	4	6	4	10	70%
Extraordinary Leave	7	5	12	6	2	8	38%

Remuneration, incentive and enhancement systems

All Group companies apply local national contracts, supplemented with any best deals.

The employees of Sabaf S.p.A. are classified according to the provisions of the National Collective Labour Contract for the metal and engineering industry, supplemented by second-level negotiations, which include:

- · contractual minimum
- company welfare from National Collective Labour Agreement
- productivity or personal bonuses per level,
- · production bonus per level,
- fixed performance bonus (part of which includes part of the previous variable bonus) for all levels,
- variable performance bonus that is the same for all levels.

Further information is provided in the notes to the consolidated financial statements.

In addition to economic incentives, the incentive system includes company agreements for access to goods or services on favourable terms for all employees, regardless of the type of contract.

The Group believes that a fundamental element of the incentive system is represented by the training opportunities provided to employees, including the possibility to participate in numerous activities organised at the premises or off-premises.

LONG-TERM INCENTIVE

A long-term incentive plan (stock grant plan) was introduced in 2018, which envisages the free allocation of shares to parties (directors and employees) who hold or will hold key positions for Sabaf S.p.A. and its subsidiaries.

The Plan aims to promote and pursue the involvement of the beneficiaries whose activities are considered relevant for the implementation of the contents and the achievement of the objectives set out in the 2018 - 2022 Business Plan, foster loyalty development and motivation of managers, by increasing their entrepreneurial approach as well as align the interests of management with those of the Company's shareholders more closely, with a view to encouraging the achievement of significant results in the economic and asset growth of the Company and of the Group.

MANAGEMENT BY OBJECTIVES (MBO)

A Group-wide incentive system linked to collective and individual objectives (MBOs) is in place, involving the Chief Executive Officer, executives with strategic responsibilities and managers. In 2018, this incentive system involved 41 employees of the Group (38 men and 3 women). Further details on the MBO mechanisms are described in the Remuneration Report.

The "Premio Produciamo Qualità (PPQ)"

(literally, "We produce quality prize")

With the aim of rewarding the contribution of personnel to the achievement of company objectives, in 2016 Sabaf S.p.A. introduced an incentive system related to quality objectives (reduction of waste and rework), production efficiency and precision in carrying out projects.

In 2018, improvement targets in these areas were set for 116 people involved in relevant business processes.

	ô	Q	89
WHITE COLLARS	38	4	42
BLUE COLLARS	67	7	74
TOTAL	105	11	116

The initiative was very well received by the employees: in addition to being a tool for steering towards challenging objectives (393 objectives were assigned, achieved or exceeded in 65% of cases), the PPQ stimulated teamwork and favoured the sharing of short- and medium-long term development plans at all company levels.

Variable Performance Bonus (PDRV)

The supplementary company contract of Sabaf S.p.A. envisages a variable performance bonus for all employees, also based on quality and productivity indicators.

From 2018, the PDRV can be enjoyed in the form of company welfare.

Personnel Participation Bonus (PDP)

In 2018, Sabaf S.p.A. introduced a Personnel Participation Bonus (PDP) for all its employees who, through effective participation, help to achieve the company's objectives.

This bonus is paid in the form of company welfare.

The forms of social security in force for all Group employees are those envisaged by the regulations in force in the various Countries in which the Group operates.

Ratio of minimum monthly salary laid down by collective labour agreements to minimum salary paid by Group companies ²⁴

2017		MINIMUM SALARY UNDER COLLECTIVE LABOUR AGREEMENT		ALARY PAID	MINIMUM 9	6 INCREASE
Values in euro	ô	Q.	ô	9	ô	Q.
Sabaf S.p.A.	1,590	1,590	1,814	2,172	14%	37%
Faringosi Hinges s.r.l.	1,590	1,590	1,771	1,771	11%	11%
A.R.C. s.r.l.	1,434	1,434	1,462	1,434	2%	0%
Turkey	308	308	352	352	14%	14%
Brazil	358	358	414	414	15%	15%
China	265	265	356	1,145	34%	332% ²⁵

2018	MINIMUM SALARY UNDER COLLECTIVE LABOUR AGREEMENT		MINIMUM SALARY PAID		MINIMUM 9	6 INCREASE
Values in euro	ô	Q	ô	9	ô	9
Sabaf S.p.A.	1,605	1,605	1,664	1,884	4%	17%
Faringosi Hinges s.r.l.	1,605	1,605	1,785	1,785	11%	11%
A.R.C. s.r.l.	1,605	1,605	1,644	1,705	2%	6%
Turkey	254	254	290	290	14%	14%
Brazil	313	313	353	353	13%	13%
China	259	259	348	1,145	34%	341%

The Group has procedures in place to systematically check the correct hiring and regular contribution of suppliers and contract workers.

Ratio of maximum to average salaries of Group companies

	2018	2017
Italy	8.4	9.6
Turkey	13.7	11.5
Brazil	7.0	6.0
China	7.0	7.5

Ratio of average salary of female personnel to average salary of male personnel

	2018	2017
White-collars, middle managers and managers	71%	67%
Blue Collars	77%	74%

²⁴ Values converted into euro at the annual average exchange rate

²⁵ Data modified compared to consolidated disclosure of non-financial information 2017 due to a publication error

Occupational health and safety and working environment

RISKS

The health & safety risks to which Sabaf and contractors' personnel are exposed are essentially linked to the processes at the Group's production sites:

- risks with high associated damage (falls from a height, work in confined spaces);
- other risks, with particular relevance in terms of accidents, related to melting tasks (burn, exposure to high temperatures).

The Group is also exposed to the risk of failure to adopt measures to bring its procedures and operations into line with current health and safety regulations.

RISK MANAGEMENT

The Sabaf Group formally defines the responsibilities, criteria and operating procedures for identifying and planning prevention measures to eliminate and/or mitigate risks, as part of a system that allows the level of safety and hygiene to be optimised and constantly improved through preventive actions.

Also aspects relating to health and safety at work are also addressed using a risk-based approach.

Prevention and reduction of risk levels are based on the following factors:

- Effective training: all training courses related to health and safety are planned and managed by internal personnel and/or external trainers, with a propensity to teach and with strong experience in the reference sector (first aid, fire-fighting, work at height, etc.). Job-specific training courses have been designed with a propensity to experience, in order to make training meetings more effective.
- Cutting-edge plants: continuous investment in increasingly modern and technologically advanced machinery reduced the levels of risk related to ergonomics and manual handling of loads and improved the systems to protect against physical risks.

Organisation: the strong involvement and constant training of department heads and their awareness of obligations and responsibilities led to a clear improvement in all aspects of Health and Safety.

In the Group companies based in Italy (Sabaf S.p.A., Faringosi Hinges s.r.l., A.R.C. s.r.l.), the risk assessment is carried out by the Employer through the collaboration of the Occupational Health and Safety Officer and the Corporate Doctor, with the participation of all responsible parties (managers and representatives). The risk assessment process, coordinated by the Safety Office, operates with the help of dedicated software. The involvement of workers is envisaged, both through periodic meetings with safety representatives through the obligation to report possible additional risks.

In October 2017, the certification process of the safety management system of Sabaf S.p.A. according to OHSAS 18001:2007 was completed. Following the checks carried out by CSQ (IMQ Certification Body), Sabaf obtained the certificate of compliance with standards.

The management system for the health and safety of workers of Faringosi Hinges s.r.l. has been certified according to OHSAS 18001 since February 2012. The system was re-certified by the TUV NORD in February 2018, certifying the conformity of the system with the reference standards; in fact, no non-conformity has emerged, but only suggestions for improvement.

During 2017, the Health and Safety operating procedures already in place at Sabaf S.p.A. were implemented in A.R.C. A new assessment of the business risk was carried out and the software for managing security aspects was introduced.

With regard to production sites abroad, the Group monitors legislative compliance through specific audits. It has also implemented a shared management system for the implementation of actions related to health and safety in the workplace.

Although the Management Systems have not been certified by an Accredited Body, Management Systems have been implemented in foreign factories in line with Group policies.

Number and duration of injuries

		2018		2017			DENIGUNA DI/26
	ô	9	69	ô	9	89	BENCHMARK ²⁶
INJURIES AT WORK - GROUP	27	2	29	12	6	18	
Italy	8	1	9	6	3	9	-
Brazil	3	0	3	0	0	0	-
China	0	0	0	0	0	0	-
Turkey	16	1	17	6	3	9	-

INJURIES WHILE TRAVELLING TO/FROM WORK - GROUP	1	1	2	3	0	3	
Italy	0	0	0	3	0	3	-
Brazil	1	1	2	0	0	0	-
China	0	0	0	0	0	0	-
Turkey	0	0	0	0	0	0	-

TOTAL HOURS OF ABSENCE DUE TO INJURIES - GROUP	1,633.9	137.0	1,770.9	1,720.3	168.5	1,888.8	
Italy	1,096.0	24.0	1,120.0	1,348.5	108.5	1,457.0	-
Brazil	110.0	59.0	169.0	0.0	0.0	0.0	-
China	0.0	0.0	0.0	0.0	0.0	0.0	-
Turkey	427.9	54.0	481.9	371.8	60.0	431.8	-

HOURS OF ABSENCE FROM WORK DUE TO INJURY PER CAPITA ²⁷	3.21	0.54	2.32	3.42	0.66	2.48	5.3

Injury frequency rate - Number of injuries (excluding injuries while travelling to/from work) x 1,000,000/ hours worked

		,	,			
		2018		2017		
	ô	9	69	ô	9	69
GROUP	30.83	5.58	23.49	14.33	15.44	14.68
Italy	13.28	3.83	10.42	9.46	10.93	9.91
Brazil	23.09	0.00	20.13	0.00	0.00	0.00
China	0.00	0.00	0.00	0.00	0.00	0.00
Turkey	121.16	13.38	82.21	52.01	44.16	49.10

Injury lost day rate - (excluding injuries while travelling to/from work) x 1,000/ hours worked

	2018			2017		
	ô	Q	69	ô	Q	69
GROUP	0.24	0.02	0.17	0.16	0.06	0.13
Italy	0.25	0.01	0.17	0.14	0.06	0.12
Brazil	0.08	0.00	0.07	0.00	0.00	0.00
China	0.00	0.00	0.00	0.00	0.00	0.00
Turkey	0.37	0.08	0.27	0.42	0.12	0.31

²⁶ FEDERMECCANICA, L'industria metalmeccanica in cifre (June 2018) – Ore pro-capite di assenza dal lavoro (2016), http://www.federmeccanica.it

²⁷ The calculation is based on the average annual personnel

During 2018, there were no particularly serious accidents for Group employees and the per capita hours of absence from work due to accidents remained well below the reference benchmark. Indicators in Turkey deteriorated, partly as a result of the start of new productions. Corrective action has been taken in good time to combat this phenomenon (training and awareness-raising on the use of personal protective equipment).

No cases of occupational disease were reported at Group level in 2018.

In compliance with the laws in force, Group companies prepared and implemented health supervisory plans for employees, with health inspections aimed at the specific risks of the work activities carried out. In particular, 2,872 health inspections were carried out in 2018 (3,108 in 2017).

Current expenditure for labour protection (amounts in €/000)

	2018	2017
Plant, equipment and materials	48	42
Personal protective equipment	118	119
External training	24	16
Advisory services	62	99
Working environment analysis	18	17
Health inspections (including pre-recruitment checks)	44	40
Software and database	4	3
TOTAL	318	336

Investments in labour protection (amounts in €/000)

	2018	2017
Plant, equipment and materials	488	34
TOTAL	488	34

The commitment to improve risk levels related to manual handling of loads and repetitive movements thanks to an increasingly greater automation of operations continued also in 2018. Special equipment for transport and storage was also studied, light detectors were installed on forklifts and the internal road network of the factories was improved (with new road signs and

road markings).

The significant economic investment made in 2018, in the superfinishing process, has allowed a significant reduction in the level of risk of repetitive movements to be borne by area personnel.

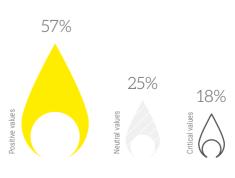


Jointly with the 2018 corporate climate analysis, a survey on the perception of work-related stress was carried out in Sabaf S.p.A., taking advantage of the large sample of interviewees. The following dimensions were analysed:

- · workload, organisation and working environment;
- · control/independence of workers;
- management support;
- support from colleagues;
- · relations and promotion of positive behaviour;
- · role and awareness of one's position in the organisation;
- · management and communication of change in the business context.

The summary results express positive values for 57%, neutral values for 25% and critical values for 18%.

Among the positive results, those relating to attention to the person, awareness of the meaning of one's role and the expectations of the organisation towards its activities stand out.



At Sabaf S.p.A., a study was carried out on the seismic vulnerability of buildings, which allowed the risk assessment to be revised. During 2019, the pathways to be followed during evacuation operations will be reviewed.

A web platform has been implemented to manage the interferential risks related to the contracting and sub-contracting work for the Ospitaletto site, allowing the immediate registration of contractors and accesses (about 15,000 in 2018).

Sabaf, a health-promoting workplace

At the beginning of 2016, Sabaf S.p.A. joined the WHP (Workplace Health Promotion) programme, committing itself to implementing **good practices in the field of workplace health promotion**. The company is committed not only to implementing all measures to prevent accidents and occupational diseases but also to offering its workers opportunities to improve their health, reducing general risk factors and in particular those most involved in the genesis of chronic diseases.

Workplace health promotion is the result of the combined efforts of employers, workers and the company. The following factors contribute to this promotion:

- · improving work organisation and the working environment
- encouraging personnel to participate in healthy activities
- promoting healthy choices
- · encouraging personal growth

The central idea is simple: Sabaf aims to build, through a participatory process, a context that encourages the adoption of positive behaviour and choices for health.

The WHP Programme envisages the development of activities (good practices) in **6 thematic areas** and requires the progressive implementation, year after year, of a minimum number of good practices in the various thematic areas.

Fight against smoking Fight against smoking Fight against showing Fight against showing Safe and sustainable mobility Well-being and reconciling life and work IMPROVEMENT MEASURES TAKEN IN 2018 Fight against addictions

Use of dangerous substances

Only materials that fully comply with the requirements of Directive 2002/95/EC (RoHS Directive) which tends to limit the use of hazardous substances such as lead, mercury, cadmium and hexavalent chromium are used for production.

Industrial relations

Sabaf complies with the labour laws of the various countries and the conventions of International Labour Organisation (ILO) on Workers' Rights (freedom of association and collective bargaining, consultation, right to strike, etc.), systematically promoting dialogue between the parties and seeking an adequate level of agreement and sharing of company strategies by the personnel.

In case of organisational changes, with regard to the minimum notice period, the Group complies with the provisions of the law and the reference contracts of the various countries.

In January 2018, the second level company agreement of Sabaf S.p.A. was renewed, valid until June 2021. The key points of this agreement are set below:

- the sharing between the company and trade unions and Unitary Union Representative Body of priorities on which to channel resources and energy in the coming years (producing quality, creating and maintaining efficiency, becoming more flexible);
- sharing objectives also through the responsible involvement of personnel;
- maintaining fair and transparent industrial relations while respecting individual roles;

- the establishment of working groups with the aim of improving the involvement of personnel at all levels;
- the continuation of the payment of a variable part of remuneration, the
 payment of which is related to measurable and verifiable quality and efficiency indicators; data on which dissemination and transparency will be
 maintained;
- the possibility of converting all or part of the variable performance bonus (PDRV) into welfare.

The internal trade union representatives present in Sabaf S.p.A. are FIOM, FIM and UILM and in Faringosi Hinges s.r.l. FIM.

During the year, regular meetings between Management and the Unitary Union Representative Body took place.

In Group companies, 120 employees, or 15.8% of the total, were registered at December 2018 (136 employees, or 18%, were registered in 2017).

Hours of participation in trade union activities during 2018 amounted to 0.27% of the hours worked.

Participation in trade union activities

	2018	2017	BENCHMARK 28
MEETING			
No. of hours	1,242	1,806	
Percentage over hours worked	0.08	0.12	
No. of hours per capita	1.6	2.7	
LEAVE FOR TRADE UNION DUTIES	S		
No. of hours	1,853	1,689	
Percentage over hours worked	0.12	0.11	
No. of hours per capita	2.4	2.5	
STRIKE			
No. of hours	996	1,006	
Percentage over hours worked	0.07	0.10	
No. of hours per capita	1.3	1.5	
TOTAL			
No. of hours	4,091	4,501	
Percentage over hours worked	0.27	0.29	
No. of hours per capita	5.36	6.71	7.4

In 2018, a total of 7 hours of strike were called out in Sabaf S.p.A. in connection with national problems.

During the last three months of the year, Sabaf S.p.A. used now and then the temporary unemployment fund.

No strikes were called out and no social safety valves were used in Faringosi Hinges, A.R.C., Sabaf do Brasil, Sabaf Turkey and Sabaf China.

Business climate analysis

The 2018 corporate climate survey project at Sabaf S.p.A. continued the knowledge and listening activities that began in 2012 and continued in 2015, with the aim of maintaining a level of knowledge of the perceptions and needs experienced by people belonging to the company.

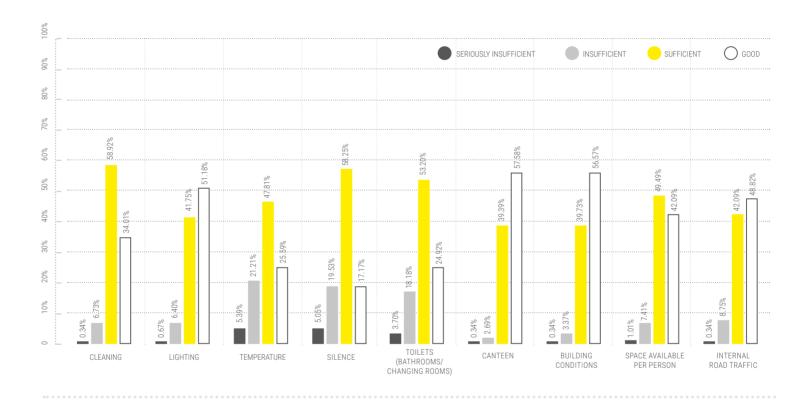
The analysis was carried out on a sample of 299 employees (59% of workers) using a questionnaire filled in anonymously and digitally in the company, as part of dedicated sessions, with the support of a consulting firm specialised in human resources.

The results were shared with the workers' representatives and disseminated in the company.

THEMATIC AREAS:

Characteristics of the working environment

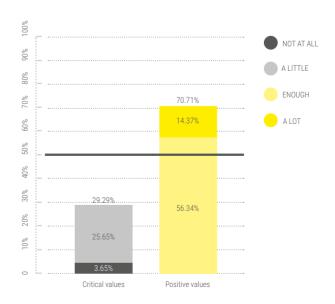
With regard to the working environment, there is generally a positive perception with choices alternating between "good" and "sufficient".



Sharing corporate values

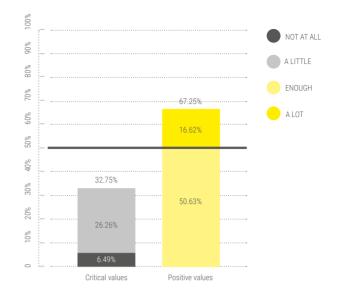
The result at this dimension is to be considered all-in-all satisfactory with 70.71% of responses with a positive value.

Business objectives are perceived as fairly clear, values communicated and generally shared. There is satisfaction with what the Company does and with the attention it pays to the needs of its workers.



Job satisfaction

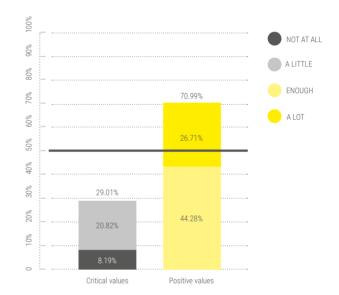
All-in-all, the result at this dimension must also be considered quite satisfactory with 67.25% of responses with a positive value. Roles and responsibilities seem relatively clear and defined, and there is a strong sense of belonging.



Relation with the Head

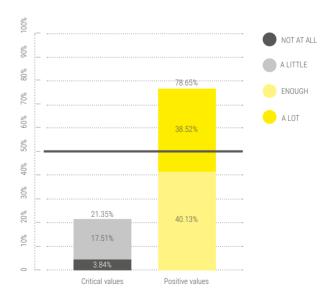
The 70.99% of the sample has an overall satisfactory perception of the relationships with their head, having provided positive responses.

In particular, the behaviour of the heads is considered consistent with the values declared by the company.



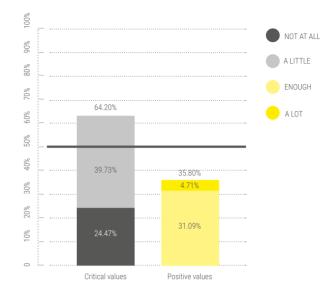
Collaboration and dialogue with colleagues

The 78.65% of the sample has an overall satisfactory perception of the relationships with their colleagues, having provided positive responses.



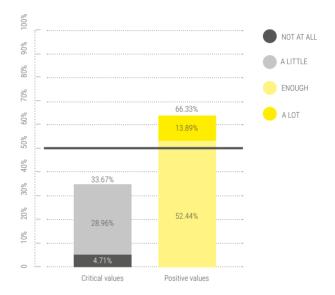
Enhancement, evaluation and incentive

Within this dimension, critical elements prevail with 64.20% of the sample identifying this as an area for improvement.



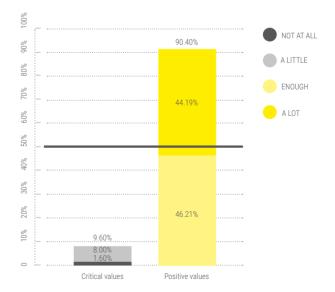
Information and communication

Within this dimension, the perception is satisfactory with 66.33% of positive responses.



Safety

A very positive fact is certainly the perception of security in the company. Workers consider Sabaf S.p.A. to be a company that is very attentive to internal health and safety (90.40% give a positive assessment of the interventions dedicated to this area).



Disciplinary measures and disputes

The Group makes use of all the instruments provided for in the contract for compliance with the company rules and social life. At 31 December 2018, 9 disputes were pending (2 with Group employees and 7 with former collaborators).

Sabaf and environment

Risks

Environmental issues are also managed through a risk-based approach, in line with the UNI EN ISO 14001:2015 standard.

Risks of external context (environmental sustainability), concerning the protection of the environment and the territory, through the reduction of environmental impacts and the containment of the use of natural and energy resources. These impacts are considered from the product design stage, through the different stages of its implementation and from a perspective that considers the whole life cycle of the product.

Strategic risks, including collaboration with strategic service providers with potential environmental risk (waste collection, cleaning services, maintenances).

Legal and compliance risks, related to compliance with law requirements (authorisations and compliance obligations) and requests of local institutions.

The following paragraph describes the management methods for these risks.

Health and safety, environmental and energy policy

PROGRAMME AND GOALS

The Group is committed to the following objectives:

- the prevention of pollution and rationalisation of the use of energy through the continuous improvement of its processes and products;
- the efficiency in the use of natural and energy resources during production, with a special reference to water and energy consumption;
- the reduction of the quantity of waste produced and the improvement of its quality in terms of hazardousness and recoverability.

Sabaf S.p.A. adopted and maintains an Integrated Management System of Health and Safety, Environment and Energy (EHS&En) that, by integrating with the other Management Systems operating within the company, is an effective means of pursuing a constant reduction in risks, environmental impacts and energy consumption through the following instruments:

- the prior assessment of EHS&En aspects in all company processes, with particular focus on design, production processes and purchases;
- maintaining full compliance with current law requirements, proactively using them as elements of continuous process monitoring;
- a training and information system involving all employees and collaborators.

Since 2003, the Environmental Management System of the Ospitaletto production site (which covers approximately 75% of the Group's total production) has been certified in compliance with ISO 14001. CSQ carried out the monitoring inspection in April 2018, confirming the adequacy of the system to the new ISO 14001:2015 Standard.

In 2015, the Energy Management System implemented at the premises of Ospitaletto was certified in compliance with the ISO 50001 standard. In November 2018, the first three-year period ended and CSQ, during the audit carried out for the re-certification, proposed the renewal of the certificate, concluding the verification with positive results.

In 2008, Sabaf S.p.A. obtained the Integrated Environmental Authorisation (IPPC) from the Lombardy Region pursuant to Legislative Decree 59 of 18 February 2005.

Dialogue with environmental associations and institutions

The Group has long promoted the dissemination of information about the lower environmental impact of using gas in cooking instead of electricity: in fact, the use of combustible gas for heat production allows higher efficiency than those obtainable with electric cooking appliances. Moreover, cooking is

increasingly characterised, all over the world, by the demand for high power and many cooking points to prepare meals quickly. Electrically powered hobs cause peak energy consumption to increase, typically around meal times, further increasing the demand for electricity.

Process innovation and environmental sustainability

METAL WASHING

In the production process of valves, it is essential to wash metals in several stages. Since 2013, Sabaf S.p.A. has been using a washing system based on a modified alcohol, a solvent that is redistillable (and therefore recyclable) due to its properties. The environmental impact and operating costs of this solvent have been substantially eliminated, as well as the emission level and production of special waste.

This efficient and sustainable technology has also been used since 2016 at the Sabaf do Brasil site, while it has recently been installed (2018) in Turkey.

MARKING OF PRODUCTS

The regulations in force require that products be marked with a number of distinctive features. Traditionally, printing has always been done with an inkjet system: the system allows printing only three lines, for a preset number of characters per line, with an annual operating cost of about $\leqslant 60,000$ for inks, solvents and maintenance. Sabaf decided to opt for a fibre optic laser writing system that allows all the necessary characters to be printed on the products without any restrictions. In recent years, with an investment of about $\leqslant 250,000$, all inkjet systems have been replaced with laser fibre optic writing systems, thus eliminating operating costs.

LIGHT ALLOY VALVES

The production of aluminium alloy valves has several advantages compared to the production of brass valves: elimination of the hot moulding phase of brass, lower lead content in the product, lower weight and consequent reduction in consumption for packaging and transport. In 2018, the process of replacing brass valves with light alloy valves continued, representing almost 90% of the valves produced.

HIGH EFFICIENCY BURNERS

For many years, Sabaf has been at the forefront of the market with burners that are characterised by yields significantly higher than standard. Following the launch of the III, AE and AEO Series, in 2012, Sabaf introduced a new family of high efficiency burners, the HE burners, capable of achieving an efficiency of up to 68%. HE burners are also characterised by almost total interchangeability with Series II burners. Over the last few years, the range of DCC special burners was completed: they are characterised by an energy efficiency of over 60%, the highest available on the market today for multiple flame ring burners. Moreover, DCC burners with a brass flame-spreader ring and efficiency of more than 65% were produced specifically for the Chinese market, the top of what is currently available on that market.

High efficiency burners represent more than 20% of the total burners produced.

Environmental impact

MATERIALS USED AND RECYCLABILITY OF PRODUCTS

Sabaf's main product lines - valves, thermostats and burners for gas cooking appliances for domestic use - are characterised by high energy efficiency and optimal use of natural resources.

Sabaf products can be easily recycled because they are made almost entirely of brass, aluminium alloys, copper and steel.

All Group companies have separate waste collection.

MATERIALS USED	2018 CONSUMPTION (t)	2017 CONSUMPTION (t)
Brass	789	540
Aluminium alloys	7,831	8,070
Zamak	33	91
Steel	7,861	7,631
Cast Iron	137	39

100% of brass and about 65% of aluminium alloys used are produced by scrap recycling; 35% of aluminium alloys and 100% of steel are produced from ore.

The lower consumption of brass is linked to the gradual replacement of brass valves with aluminium alloy valves. Sabaf products fully comply with the requirements of Directive 2002/95/EC (RoHS Directive) that aims to limit the use of hazardous substances such as lead in the production of electrical and electronic equipment, a category that includes all household appliances including gas cooking appliances (which are equipped with electronic ignition). Moreover, Sabaf products fully comply with the requirements of **Directive** 2000/53/EC (End of Life Vehicles), i.e. the heavy metal content (lead, mercury, cadmium, hexavalent chromium) is below the limits imposed by the Directive. With regard to the **REACH Regulation** (Regulation no. 1907/2006 of 18/12/2006), Sabaf is a downstream user of substances and preparations. The products supplied by Sabaf are classified as articles that do not give rise to the intentional emission of substances during normal use, therefore there is no registration of the substances contained in them. Sabaf contacted its suppliers to ensure that they fully comply with REACH Regulation and to obtain confirmation that they meet their obligations to pre-register and register the substances or preparations they use. Moreover, Sabaf constantly monitors the legislative changes relating to REACH Regulation, in order to identify and manage any new requirements in this area.

ENERGY SOURCES 29

ELECTRICITY	2018 CONSUMPTION	2017 CONSUMPTION	2016 CONSUMPTION
	(MWh)	(MWh)	(MWh)
Total	30,225	30,841	27,189
NATURAL GAS	2018 CONSUMPTION	2017 CONSUMPTION	2016 CONSUMPTION
	(m³ x 1000)	(m³ x 1000)	(m³ x 1000)
Total	3,918	4,059	3,432
DIESEL	2018 CONSUMPTION	2017 CONSUMPTION	2016 CONSUMPTION
	(I x 1000)	(I x 1000)	(I x 1000)
Total	21	5.5	0
TOTAL CONSUMPTION	2018 CONSUMPTION	2017 CONSUMPTION	2016 CONSUMPTION
	GJ	GJ	GJ
Total	249,866	272,329	234,094

Sabaf S.p.A., Sabaf do Brasil and Sabaf Turkey use natural gas as an energy source for the casting of aluminium and for the firing of enamelled lids. The production of Faringosi Hinges s.r.l. and A.R.C. s.r.l. does not use natural gas as an energy source.

INDICATOR: ENERGY INTENSITY

ENERGY INTENSITY	2018 CONSUMPTION	2017 CONSUMPTION	2016 CONSUMPTION
KWh on turnover	0.460	0.489	0.483

ENERGY DIAGNOSIS

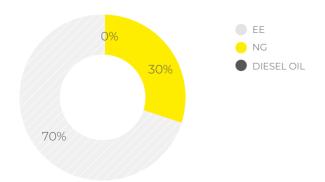
During 2015, Sabaf S.p.A. and Faringosi Hinges s.r.l. carried out an energy audit, aimed at obtaining an in-depth knowledge of the energy consumption profile of their activities and identifying and quantifying energy saving opportunities.

Main energy sources used

The main sources used are:

- electricity, for all the equipment with electric power supply present, whether functional or not to the production process, which covers 70% of the total energy requirement;
- natural gas, related to the operation of both production plants (foundry furnaces, washing burners, enamel kilns) and service plants (heating), which covers 30% of total energy requirements.

SABAF S.p.A. - INCOMING ENERGY MIX



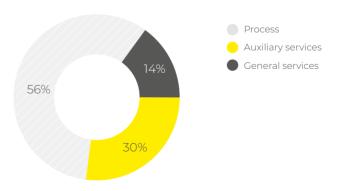
Energy demand analysis by purpose

The production processes that absorb the highest energy consumption are foundry (30% of the total), compressed air production (19% of the total) and enamelling (8% of the total).

The energy requirement of auxiliary services is mainly attributable to the management of the wastewater from the foundry and the enamelling (5% of the total).

The energy requirement of general services is largely attributable to heating and lighting.

SABAF S.p.A. - ENERGY DEMAND BY PURPOSE



²⁹ The factors used to calculate 2017 consumption were published by the Department for Business, Energy & Industrial Strategy (BEIS) in 2015. The updated factors published by the Department for Environment, Food and Rural Affairs (DEFRA) in 2018 were used for 2018 consumption.

Following the completion of the data collection system, the consumption of diesel for 2018 also includes the consumption of the company fleet owned by the Group and the consumption of diesel relating to Sabaf S.p.A. In 2017, only the consumption of diesel oil of ARC s.r.l. was considered

2019 Objectives



Continuation of leak detection and repair and optimisation of process management of compressed air production.



Assessment of energy revamping of company wastewater treatment plants.

WATER	2018 CONSUMPTION (m³)	2017 CONSUMPTION (m³)	
From municipal water supply	110,655	81,472	
From well	29,185	31,329	
TOTAL	139,840	112,801	

All the water used in the production processes by Group companies is destined for disposal or internal recycling for reuse in company processes: as a consequence, there is no industrial waste water. The water used in the

die-casting and enamelling processes in Italy, recovered through a rainwater collection system or taken from the well, at the end of the production processes, is treated in concentration plants that have significantly reduced the quantities of water required and waste produced. The commitment to optimise water-using processes and improve water management related to the cooling of the company's die-casting circuit continues.

For 2019, the Group has set itself the objective of implementing at its Brazilian production site a system for recovering industrial water from the process of enamelling covers, which will allow a significant reduction in the use of water resources.

WASTE

Trimmings and waste from the production process are identified and collected separately for recycling or disposal. The risers deriving from aluminium die-casting are intended for direct reuse. The waste for disposal and recycling is summarised below:

WASTE (TONS)

	2018	% INCIDENCE	2017	% INCIDENCE
Similar to urban	186	2.2	189	2.2
Non-hazardous (disposal)	1,722	20.0	1,810	21.3
Non-hazardous (recycling)	4,286	49.6	4,391	51.8
Tot. non hazardous	6,008	69.6	6,201	73.1
Hazardous (disposal)	992	11.5	952	11.2
Hazardous (recycling)	1,442	16.7	1,143	13.5
Tot. hazardous	2,434	28.2	2,095	24.7
TOTAL	8,628	100	8,485	100
Value of production	38,913		39,602	
Tot waste/val. of product	0.22		0.21	
Tot. Hazard. waste/val of product	0.06		0.05	

During 2018, the incidence of waste on the value of production remained in line with 2017. The company's commitment focused on reducing the production of hazardous special waste, investing in the search for raw materials and substances, at the input stage, already not hazardous originally. For 2019, the Group has the objective of modifying the technology for managing wastewater from the process of enamelling covers at the Ospitaletto production site. Currently, the waste generated is liquid, with an annual vol-

ume of about 500 tonnes and an energy consumption equal to 3% of the total company requirements. The transition from an evaporator to a chemical-physical treatment will cancel out the energy impact and reduce the volume of waste, in this case solid waste, related to the enamelling process to 10 tonnes per year.

No significant spills occurred in 2018.

EMISSIONS INTO THE ATMOSPHERE

A large part of atmospheric emissions of the Sabaf Group derives from activities defined as "negligible pollution".

- Three production processes are carried out at Sabaf S.p.A:
 - 1- the production of the components that make up the burners (nozzle holder sumps and flame spreaders) involves the casting and subsequent die-casting of the aluminium alloy, sandblasting of the pieces, a series of mechanical processes with removal of material, washing of some components, assembly and testing. This production process results in the emission of negligible amounts of oily mists, as well as dust and carbon dioxide; 2- the production of burner covers, where steel is used as raw material, which is submitted to blanking and minting. The semi-finished covers are then used for washing, sandblasting, application and firing of enamel, a process that generates the emission of dust;
 - 3- the production of valves and thermostats, in which mainly aluminium alloy, brass bars and moulded bodies and, to a much lesser extent, steel bars are used as raw materials. The production cycle is divided into the following phases: mechanical machining with removal of material of bars and moulded parts, washing of semi-finished products and components obtained in this way, finishing of the coupling surface of bodies and masks with a diamond tool, assembly and final inspection of the finished product. This process generates negligible oily mists.

- In Faringosi Hinges s.r.l., steel is used as the main raw material for the production of hinges, and is subjected to a series of mechanical processing and assembly that do not involve any significant emissions.
- In A.R.C. s.r.l., where professional burners are produced through mechanical processing and assembly, no significant emissions are recorded.
- The entire burner production process is carried out at Sabaf do Brasil. An analysis of the internal process shows that there are no significant emissions.
- The entire burner production process is carried out at Sabaf Turkey. An analysis of the internal process shows that there are no significant emissions.
- Sabaf China carries out mechanical processing and burner assembly operations. Emissions are completely negligible.

The efficiency level of the purification systems is ensured through their regular maintenance and the regular monitoring of all emissions. Monitoring in 2018 showed that all emissions complied with the limits imposed by the law.

${\rm CO_2}$ EMISSIONS (tons) 30

	2018	2017	2016
Scope 1 (direct emissions) ³¹	8,022	8,508	6,949
Scope 2 (indirect emissions) - location based	10,498	11,570	10,162
Scope 2 (indirect emissions) - market based	13,133	N/A	N/A
Total emissions Scope 1+2 (location based)	18,520	20,078	17,111

The use of natural gas to power melting furnaces results in the emission of NOX and SOX into the atmosphere, however these emissions are not significant. Sabaf does not currently contain any substances that damage the atmospheric ozone layer, with the exception of the refrigerant used in some air conditioners (R22), which is managed in compliance with the reference standards.

³⁰ The factors used for calculating emissions are:

⁻ year 2016: Department for Business, Energy & Industrial Strategy (BEIS) in 2015 - Defra 2016 for emissions related to natural gas consumption;

⁻ year 2017: Department for Business, Energy & Industrial Strategy (BEIS) in 2015 - Defra 2017 for emissions related to natural gas consumption;

⁻ year 2018: Scope 1 fuels and F-GAS: Defra 2018 - Scope 2 Location-based: Terna 2016 - Scope 2 Market-based: AIB 2017, where available, otherwise Terna 2016.

³¹ the 2017 and 2016 data has been amended from 2017 consolidated disclosure of non-financial information to include information that was not available at the date of the previous statement

Environmental investments

ENVIRONMENTAL CURRENT EXPENDITURE (AMOUNTS IN €/000)

	2018	2017
Waste disposal	533	511
Advisory services	58	27
Analysis of emissions	20	18
Training	2	2
Plant, equipment and materials	53	22
Software and database	1	0
TOTAL	667	580

ENVIRONMENTAL INVESTMENTS (AMOUNTS IN €/000)

	2018	2017
Plant, equipment and materials	268	33
TOTAL	268	33

In 2018, investments were made in:

- extraordinary maintenance of atmospheric emission plants in the foundry department;
- improvement of waste collection areas within departments, to facilitate a more immediate and correct separation of the various types of waste;
- implementation of a modified alcohol washing at Sabaf Turkey and a plant at Sabaf S.p.A.

Disputes

In 2018, the Group did not suffer any sanctions related to environmental compliance and no dispute is pending.

Sabaf, the management of product quality and customer relations

Risks

The new UNI EN ISO 9001:2015 standard with Sabaf complies, introduces the concept of a "risk-based approach", which is fundamental for planning the quality management system.

Strategic risks, including intellectual property protection (there is a risk that some Group products, even if under patent protection, may be copied by competitors) and collaboration with critical suppliers.

Legal and compliance risks, relating to non-compliance with product regulations: Sabaf operates in international markets that adopt different laws and regulations. The product must therefore comply with the mandatory and voluntary requirements and the organisation must be able to show this consistency to the certification bodies responsible for control.

Quality management policy

The Quality Management System has the aim of enabling the achievement of the following objectives:

- a. increasing customer satisfaction by understanding and meeting their present and future requirements;
- b. continuous improvement of processes and products, also aimed at protecting the environment and the safety of employees;
- c. involvement of partners and suppliers in the continuous improvement process, favouring the "comakership" logic;
- d. valuation of human resources;
- e. improvement of business performance and of the quality management system based on risk based thinking.

In order to contribute consistently to the pursuit of these objectives, the Sabaf Group undertakes a series of commitments explicitly stated in the Charter of Values:

- to act with transparency, correctness and contractual fairness;
- to communicate product information in a clear and transparent manner;
- to adopt a professional and helpful behaviour towards customers;
- not to give gifts to customers that exceed normal courtesy practices and that may tend to influence their objective assessment of the product;
- to guarantee high quality standards of the offered products;
- to ensure constant attention in technological research in order to offer innovative products;
- to collaborate with customer companies to ensure that the end user is fully confident in using the products;
- to promote social responsibility actions throughout the production chain;
- to listen to customers' requirements through constant monitoring of customer satisfaction and complaints, if any;
- to inform customers of potential risks related to the use of products, as well as the related environmental impact.

Group companies that have obtained quality certification according to the ISO 9001:2008 standard:

COMPANY	YEAR OF FIRST CERTIFICATION
Sabaf S.p.A.	1993
Faringosi Hinges	2001
Sabaf do Brasil	2008
Sabaf Turkey	2015

During 2018, the Quality Management System was constantly monitored and maintained to ensure the correct implementation and compliance with the requirements of the ISO 9001 standard. As part of the internal audit plan for 2018, a total of 26 functional areas of offices and production departments were checked at the Ospitaletto factory, 14 at Sabaf do Brasil and 14 at Sabaf Turkey. The results of these checks did not reveal any critical aspects of the system, which therefore fully complies with the standard.

With regard to third party inspections of the Quality Management System, in 2018 CSQ (IMQ Certification Body) carried out the annual inspection at the premises of Ospitaletto and at the factory of Sabaf Turkey, confirming the adequacy of the System and the maintenance of ISO 9001 certification. For the Brazilian factory, the next inspection by the certification body is scheduled for 2019.

Note that, with inspections in 2018, the Company adapted the Quality Management System to the new version of the ISO 9001:2015 Standard.

In September 2018, the TUV NORD certification body carried out the certification audit of the Quality Management System of Faringosi Hinges, in accordance with UNI EN ISO 9001:2015. The intervention ended successfully.

Quality current expenditure (amounts in €/000)

	2018	2017
Product certification	131	106
Certification and quality management system	17	7
Measuring equipment and instruments (purchase)	47	102
Measuring equipment and instruments (calibration)	30	34
Technical standards, software and magazines	3	3
Training	0	3
Tests in external laboratories	36	39
Total	263	294

Investments in quality (amounts in €/000)

	2018	2017
Measuring equipment and instruments (purchase)	90	182
Total	90	182

Customer Health and Safety

Sabaf protects the health of consumers by checking that the materials that make up its products comply with the international directives in force (such as REACH and RoHs).

To ensure the safe operation of valves, thermostats and burners, Sabaf carries out leak tests on 100% of its production.

Valves and thermostats are also certified by third parties that guarantee compliance with the operating and safety requirements required to be marketed on the world market.

Hinges do not pose a significant risk to consumer safety.

Customer satisfaction

The customer satisfaction survey, carried out every two years, is part of the stakeholder engagement activities that Sabaf undertakes in order to constantly improve the quality of the services offered and to respond to customer expectations. The latest survey, carried out in February 2017, confirmed the positive opinion of customers by pointing out that the quality of its products and its timeliness, professionalism and competence in technical and commercial assistance are among its strong points.

Customer complaint handling

Sabaf systematically handles all complaints from customers. A specific process is in place and envisages:

- · analysis of the alleged defect to assess its validity;
- · identification of the causes of the defect;
- corrective actions necessary to prevent or limit the recurrence of the problem;
- customer feedback through 8D reports (quality management tool that enables a cross-functional team to determine the causes of problems and provide effective solutions).

The following table shows the trends in terms of the number of customer complaints in the Group.

The causes of complaints vary from product to product and can be summarised mainly in:

- · aesthetic defects for the family of covers and burner flame spreaders;
- size and/or operating anomalies for the family of valves and thermostats;
- die-casting defects for sumps and burner flame spreaders.

NUMBER OF WELL-FOUNDED CUSTOMER COMPLAINTS 2018 2017

Disputes

There is no dispute in place.

Sabaf and supply chain management

Risks

The supply chain presents different types of risks, which must be assessed and monitored in order to limit the possibility of damage to the company.

Risks of external context. Considering that a significant (although not predominant) portion of purchases takes place on international markets, the Group monitors and manages the risk of instability in supplier Countries.

Strategic risks related to a socially responsible approach along the supply chain (quality of supply, respect for the environment, energy consumption and respect for human rights and protection of workers). The definition of the criticality level, especially environmental and social, derives from a risk assessment that takes into account the type of process, product or service provided and the geographical location of the supplier.

Operational risks: including continuity of supplies, assessed by paying attention to the financial sustainability of the suppliers.

Supply chain management policy

THE SA8000 STANDARD AND SUPPLIERS

In 2009, Sabaf S.p.A. obtained the certification of compliance with the requirements of the SA8000 (Social Accountability 8000) Standard and, therefore, the Company requires its suppliers to comply, in all their activities, with the principles of the Standard, as a minimum criterion for establishing a lasting relationship based on the principles of social responsibility. Supply contracts include an ethical clause inspired by the SA8000 standard, which commits suppliers to ensure respect for human and social rights and in particular: avoid the employment of persons below the age established by the standard, provide workers with a safe workplace, protect trade union freedom, comply with the law on working hours, ensure workers that the minimum salary required by law will be complied with.

In 2017, Sabaf S.p.A. complied with the updating of the SA8000:2014 standard and asked all suppliers, bound by contract, to act in the same way and comply with the latest version of the principles. During the year, Sabaf S.p.A. carried out a risk analysis of the supply chain in line with the requirements of SA8000 in order to prepare an action plan and monitor the suppliers considered critical for the purposes of the Standard. The analysis was carried out taking into account the geographical location, the sector to which it belongs, the type of business and the importance of turnover with regard to Sabaf. A questionnaire was sent out to verify understanding of the standard and assess the social responsibility aspects of each supplier. The replies received did not show any non-compliance.

Failure to comply with or to accept the principles of the SA8000 standard may lead to the termination of supply contracts.

If the law in force already requires Sabaf to meet the minimum requirements, the risk is considered to be lower, otherwise periodic audits relating to quality, environment and social responsibility management are carried out. In 2018, class A and B suppliers were analysed to cover 95% of the expenditure. This analysis revealed 20 cases of suppliers considered potentially critical, following which 17 audits were carried out (18 in 2017) from which no critical non-conformities were found but only observations. In connection with non-critical non-compliances, the suppliers were asked to take appropriate action.

RELATIONS WITH SUPPLIERS AND CONTRACTUAL CONDITIONS

Relations with suppliers are based on long-term collaboration and on fairness in negotiations, integrity and contractual fairness and the sharing of growth strategies.

To encourage the sharing with suppliers of the values that underpin its business model, Sabaf has distributed the Charter of Values in a widespread manner. Sabaf guarantees absolute impartiality in the choice of suppliers and undertakes to strictly comply with the agreed payment terms.

Sabaf requires its suppliers to be able to renew themselves technologically, so that the best quality/price ratios can always be proposed, and favours suppliers who have obtained or are obtaining Quality and Environmental System certifications.

In 2018, the turnover of suppliers of the Sabaf Group with a Certified Quality System was equal to 71.7% of the total (70.9% in 2017).

Purchase analysis

As shown in the table below, the Sabaf Group aims to encourage development in the area in which it operates and, therefore, in selecting suppliers, favours local companies.

	TOTAL 2018 PURCHASES (€/000)	% DOMESTIC PURCHASES
Sabaf S.p.A.	75,086	76.5
Faringosi Hinges s.r.l.	7,320	98.1
A.R.C. s.r.l.	3,465	85.6
Sabaf Turkey	8,555	88.0
Sabaf do Brasil	8,296	86.1
Sabaf China	598	97.2

Territorial distribution of suppliers (amounts in €/000)

	20	2018		2017	
	TOTAL PURCHASES	%	TOTAL PURCHASES	%	
Province of Brescia	31,962	30.8	31,833	30.4	
Italy	37,189	35.8	38,959	37.2	
EU	11,611	11.2	11,539	11.0	
Brazil	7,142	6.9	6,388	6.1	
Turkey	7,593	7.3	7,193	6.9	
Other	8,427	8.0	8,692	8.3	
Total	103,924	100	104,604	100	

Most of the purchases outside the European Union come from suppliers located in China. Chinese suppliers signed the clause for compliance with the principles of the SA8000 standard.

For all Group companies, the main machinery used (die-casting machines, processing and assembly transfer) is supplied by Italy to ensure homogeneous production processes in terms of quality and safety.

Breakdown of purchases by type (€/000)

	20	2018		2017	
	TOTAL PURCHASES	%	TOTAL PURCHASES	%	
Raw Materials	17,685	17.0	27,302	26.1	
Components	44,762	43.1	32,492	31.1	
Capital equipment	11,348	10.9	13,604	13.0	
Services and other purchases	30,129	29.0	31,205	29.8	
Total	103,924	100	104,603	100	

Very short payment terms are agreed for artisan and less structured suppliers (mainly 30 days).

Disputes

There are no disputes with suppliers.

Sabaf, Public Administration and Community

Relations with the Public Administration

In line with the reference policy lines, the relations of Sabaf with the Public Administration and the Tax Authorities are based on the utmost transparency and fairness.

At local level, Sabaf has tried to establish an open dialogue with the various authorities to achieve a shared industrial development.

Relations with industrial associations

Sabaf S.p.A. is one of the founders of CECED Italia(now APPLiA, the association that develops and coordinates in Italy the study activities promoted at European level by Ceced (European Committee of Domestic Equipment Manufacturers) with the related scientific, legal and institutional implica-

tions in the household appliances sector.

Sabaf S.p.A. has been a member of Associazione Industriale Bresciana (AIB) since 2014, which is a member of the Confindustria system.

Relations with universities and the student world

Sabaf S.p.A. systematically organises company visits with groups of students and bears witness of best practices on social responsibility at im-

portant conferences in different cities in Italy.

Charitable initiatives and perks

The Group's humanitarian initiatives include support for the Associazione Volontari per il Servizio Internazionale (AVSI), a non-governmental, non-profit organisation engaged in international development aid projects.

The donations are intended to support twenty children living in different Countries of the world at a long distance.

Disputes

There are no significant disputes with Public Bodies or other representatives of the community.

Sabaf and shareholders

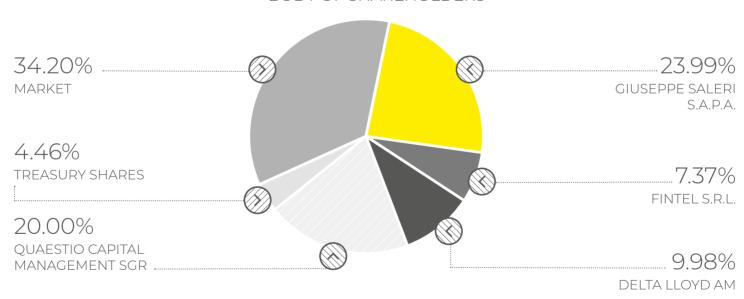
The composition of the share capital







BODY OF SHAREHOLDERS



Investor relations and financial analysts

Since its listing on the Stock Exchange (1998), the Company has attributed strategic importance to financial communication. Sabaf's financial communication policy is based on the principles of fairness, transparency and continuity, in the belief that this approach allows investors to correctly evaluate the Company. In this perspective, Sabaf guarantees maximum willingness

to engage in dialogue with financial analysts and institutional investors. In 2018, the Company met with institutional investors as part of roadshows organised in Milan and London. Some investors also held meetings with the management at the company headquarters in Ospitaletto, taking the opportunity to visit the production facilities.

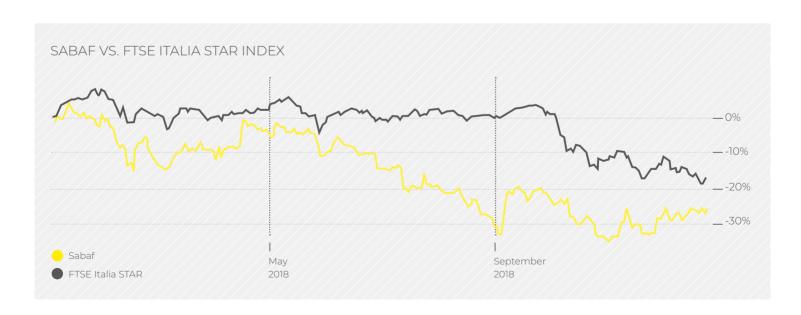
Remuneration of shareholders and share performance

In 2018, the Sabaf share recorded the highest official price on 9 January (\leqslant 20.910) and lowest on 2 November (\leqslant 13.027). The average volume traded was 9,381 shares per day, equal to an average value of \leqslant 164,508

(€ 346,647 in 2017). The performance of the stock in 2018 was affected by the general weakness of the share prices.

2018 PERFORMANCE OF SABAF SHARES (PRICE AND VOLUMES TRADED)





The dividend policy adopted by Sabaf aims to guarantee a valid remuneration of shareholders also through the annual dividend of € 0.55 per share in 2018.

Socially responsible investments

Sabaf shares have frequently been analysed by analysts and managers of SRI funds, who have also invested in Sabaf on several occasions.

Disputes

There is no dispute with shareholders.

Sabaf and lenders

Relations with credit institutions

The 2018-2022 Business Plan envisages the financing of growth also through greater use of financial debt, which is expected to remain within the parameters of absolute security (net financial debt to EBITDA ratio below 2). At 31 December 2018, the net financial debt was \leqslant 53.5 million, compared with \leqslant 25.5 million on 31 December 2017.

Relations with banks have always been based on maximum transparency. Relations with institutions that are able to support the Group in all its financial needs and to propose solutions in a timely manner to meet specific needs are privileged.

Disputes

There is no dispute with the lenders

Sabaf and competitors

Trends in the cooking appliance manufacturer sector

For years, there has been a clear trend in the sector to outsource the design and production of components to highly specialised suppliers who, like Sabaf, are active in the main world markets and are able to provide a range of products that meets the specific requirements of different markets. Furthermore, the trend towards the internationalisation of production is accentuated, with production increasingly relocated to countries with low labour costs and lower saturation levels.

The entry of new players on the international scene has also led to a situation of oversupply, which generates strong competitive tensions and is evolving into a greater concentration of the sector. This trend is less evident for cooking appliances than for other household appliances: in the cooking sector, in fact, design and aesthetics on the one hand and the lower intensity of investments on the other allow the success of even small and highly innovative producers.

Main Italian and international competitors

In Italy and Europe, Sabaf estimates to have a market share of more than 40% in each product segment and is the only company to supply the full range of gas cooking components, while its competitors only produce part of the product range.

The main competitors of the Sabaf on the international market are Copreci, Defendi and Robertshaw.

Copreci is a cooperative located in Spain in the Basque Country, part of Mondragon Cooperative Corporation and represents Sabaf's main competitor in terms of valves and thermostats.

Defendi is an Italian company, acquired in 2013 by the German group EGO, and is mainly active in the production of burners in Italy and Brazil.

Robertshaw is the leading producer of gas components for the North American market.

Main Italian and international competitors

	VALVES	THERMOSTATS	BURNERS	HINGES
SABAF GROUP				
Copreci (Spain)		©		
Defendi Italy (Italy)	©			
Robertshaw (USA)	©		(
Somipress (Italy)				
CMI (Italy)				©
Nuova Star (Italy)				©

2016 and 2017 economic data of the main Italian competitors 32

	2017		2016			
€/000	SALES	EBIT	NET RESULT	SALES	EBIT	NET RESULT
SABAF GROUP	150,223	18,117	14,835	130,978	12,530	9,009
DEFENDI ITALY	56,562	3,516	2,534	54,959	2,316	1,799
SOMIPRESS GROUP	37,797	3,060	1,996	36,972	2,323	1,214
CMI	22,880	560	730	20,516	738	898
NUOVA STAR	33,418	323	189	30,007	174	118

No further information is available on competitors due to the difficulty of finding the data.

Disputes

There is a dispute pending against a competitor following an alleged violation of one of our patents.

There is also a dispute in place brought by a competitor for alleged infringement of a patent that the Group considers totally groundless.

 $^{^{32}}$ Sabaf processing from the financial statements of the various companies. Latest available data



EY S.p.A. Corso Magenta, 29 25121 Brescia Tel: +39 030 2896111 Fax: +39 030 295437 ev.com

Independent auditors' report on the consolidated disclosure of nonfinancial information in accordance with Article 3, par. 10, of Legislative Decree 254/2016 and with Article 5 of CONSOB Regulation adopted with Resolution n. 20267 of 18thJanuary 2018 (Translation from the original Italian text)

To the Board of Directors of Sabaf S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to Article 3, paragraph 10, of Legislative Decree 30 December 2016, n. 254 (hereinafter "Decree") and article 5 of CONSOB Regulation adopted with Resolution 20267/2018, on the consolidated disclosure of non-financial information of Sabaf S.p.A. and its subsidiaries (hereinafter the "Group") for the year ended on 31st December 2018, in accordance with article 4 of the Decree and approved by the Board of Directors on 26th March 2019 (hereinafter "DNF").

Responsibilities of Directors and Board of Statutory Auditors for the DNF

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined in 2016 by GRI - Global Reporting Initiative ("GRI Standards") identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.

Auditors' independence and quality control

We are independent in accordance with the ethics and independence principles of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the International Standard on Quality Control 1 (ISQC Italia 1) and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

EV S.p.A.
Sede Legale: Via Po, 32 - 00198 Roma
Capitale Sociale Euro 2.525.000,00 i.v.
Iscritta alla S.O. dell Registro delle Imprese presso la C.C.I.A.A. di Roma
Codice fiscale e numero di iscrizione 00434000684 - numero R.E.A. 250904
P.IVA 00901231003
Incritta al Registro Revisori Legali al n. 70945 Pubblicato sulla G.U. Suppl. 13 - IV Serie Speciale del 17/2/1998
Iscritta al Rappressivo n. 2 dellabera n. 10331 del 16/7/1997

A member firm of Ernst & Young Global Limited



Auditors' responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the GRI Standards. Our work has been performed in accordance with the principle of "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

- analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
- analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
- comparison of the economic and financial data and information included in the DNF with those included in Sabaf Group's consolidated financial statements;
- 4. understanding of the following aspects:
 - Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
 - policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
 - main risks, generated or suffered related to the matters indicated in the article 3 of the Decree.

With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below.

understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF.

In particular, we have conducted interviews and discussions with the management and other personnel of Sabaf S.p.A. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.



Furthermore, for significant information, considering the Group activities and characteristics:

- at Group level
 - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence:
 - with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- For the site of Ospitaletto of Sabaf S.p.A. that we have selected based on its activity, relevance to the consolidated performance indicators and location, we have carried out a site visit during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the Sabaf Group for the year ended on 31st December 2018 has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the GRI Standards.

Other Information

The Group has prepared a social report for the year ended on 31st December 2016; such data are presented for comparative purposes in the DNF. This social report has been subject to voluntary limited assurance procedures in accordance with ISAE 3000 Revised by another auditor, that has expressed an unqualified conclusion.

The DNF for the year ended on 31st December 2017, whose data are presented for comparative purposes, has been subject to limited assurance procedures by another auditor, who expressed a unqualified conclusion on this DNF on 13th April 2018.

Brescia, 12th April 2019

EY S.p.A.

Signed by: Massimo Meloni (Partner)

This report has been translated into the English language solely for the convenience of international readers.

GRI Content Index

GRI STANDARD	DISCLOSURE		PAGE (OR DIRECT REFERENCE)	OMISSION		
GRI 101: Foundation 2016						
General Disclo	sures					
	ORGANIZATIONAL PROFILE					
	102-1	Name of the organization	Cover page			
	102-2	Activities, brands, products, and services	pages 18-21			
	102-3	Location of headquarters	Via dei Carpini, 1 25035 Ospitaletto (Brescia)			
	102-4	Location of operations	pages 20-23			
	102-5	Ownership and legal form	pages 44-46; 95			
	102-6	Markets served	pages 20-23			
	102-7	Scale of the organization	pages 12-23			
	102-8	Information on employees and other workers	pages 63-64; 71-72			
	102-9	Supply chain	pages 92-93			
	102-10	Significant changes to the organization and its supply chain	page 27			
	102-11	Precautionary Principle or approach	pages 38; 57-58			
	102-12	External initiatives	pages 30; 40-41;			
	102-13	Membership of associations	page 94			
	STRATEGY					
	102-14	Statement from senior decision-maker	pages 28-29			
		ID INTEGRITY		1		
	102-16	Values, principles, standards, and norms of behavior	pages 30-32			
	GOVERNA	NCE				
GRI 102:	102-18	Governance structure	pages 44-56			
General Disclosures 2016	102-22	Composition of the highest governance body and its committees	pages 46-51			
2010	STAKEHOLDER ENGAGEMENT					
	102-40	List of stakeholder groups	page 39			
	102-41	Collective bargaining agreements	page 73			
	102-42	Identifying and selecting stakeholders	page 39			
	102-43	Approach to stakeholder engagement	page 39			
	102-44	Key topics and concerns raised	pages 39; 91			
	REPORTING PRACTICE					
	102-45	Entities included in the consolidated financial statements	pages 20-21; 27			
	102-46	Defining report content and topic Boundaries	pages 27; 42			
	102-47	List of material topics	pages 42-43			
	102-48	Restatements of information	page 27			
	102-49	Changes in reporting	pages 27; 42			
	102-50	Reporting period	page 27			
	102-51	Date of most recent report	Anno 2017			
	102-52	Reporting cycle Contact point for questions regarding the report	page 27 Tel.: +39 030 - 6843001, Fax: +39 030 - 6848249 E-mail: info@sabaf.it			
	102-54	Claims of reporting in accordance with the GRI Standards	page 27			
	102-55	GRI content index	pages 102-105			
	100 50	le i i	00 101			

pages 99-101

102-56

External assurance

GRI STANDARD	DISCLOSURE		PAGE (OR DIRECT REFERENCE)	OMISSION
Material Topics	;			
GRI 200 Econo	mic Stan	ndards Series		
	ECONON	MIC PERFORMANCE		
ODI 100	103-1	Explanation of the material topic and its Boundary	pages 42-43	
GRI 103: Management	103-2	The management approach and its components	pages 57-58	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58	
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	page 36	
	MARKET	PRESENCE		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 62-63; 73-74	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 62-63; 73-74	
GRI 202: Market Presence 2016	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	page 75	
	ANTI-CO	PRRUPTION		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 61	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 61	
GRI 205: Anti-Corruption 2016	205-3	Confirmed incidents of corruption and actions taken	page 61	
GRI 300 Enviro	nmental	Standards Series		
	ENERGY			
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 84-85; 86-87	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 84-85; 86-87	
GRI 302:	302-1	Energy consumption within the organization	page 86	
Energy 2016	302-3	Energy intensity	page 86	
	EMISSIO	NS		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 84-85; 88-89	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 84-85; 88-89	
GRI 305:	305-1	Direct (Scope 1) GHG emissions	page 88	
Emissions 2016	305-2	Energy indirect (Scope 2) GHG emissions	page 88	
	EFFLUEN	NTS AND WASTE		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 84-85; 87-88	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 84-85; 87-88	
GRI 306: Effluents and Waste 2016	306-2	Waste by type and disposal method	pages 87-88	
	ENIVOR	MENTAL COMPLIANCE		
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	pages 42-43	
	103-2	The management approach and its components	pages 57-58; 84-85	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 84-85	
GRI 307: Environmental compliance 2016	307-1	Non-compliance with environmental laws and regulations	page 89	

GRI STANDARD	DISCLOSURE		PAGE (OR DIRECT REFERENCE)	OMISSION
GRI 400 Social	Standards	s Series		
	EMPLOYM	IENT		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management Approach 2016	103-2	The management approach and its components	pages 57-58; 62-63; 66	
	103-3	Evaluation of the management approach	pages 57-58; 62-63; 66	
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	pages 66-69	
	LABOR/M	ANAGEMENT RELATIONS		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management	103-2	The management approach and its components	pages 57-58; 62-63; 80	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 62-63; 80	
GRI 402: Labor management relations 2016	402-1	Minimum notice periods regarding operational changes	page 80	
	OCCUPAT	IONAL HEALTH AND SAFETY		
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43	
Management Management	103-2	The management approach and its components	pages 57-58; 76-79	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 76-79	
GRI 403: Occupational Health and Safety 2016	403-2	Hazard identification, risk assessment, and incident investigation	pages 76-78	H&S indexes on the external workforce currently omitted because data are not available; the data collection system will be updated starting from 2019.
	TRAINING	AND EDUCATION		
GRI 103: Manage-	103-1	Explanation of the material topic and its Boundary	pages 42-43	
ment Approach	103-2	The management approach and its components	pages 57-58; 62-63; 70	
2016	103-3	Evaluation of the management approach	pages 57-58; 62-63; 70	
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	page 70	
	DIVERSITY	AND EQUAL OPPORTUNITY		
	103-1	Explanation of the material topic and its Boundary	pages 42-43	
GRI 103: Management	103-2	The management approach and its components	pages 50; 57-58; 62-63; 71-72	
Approach 2016	103-3	Evaluation of the management approach	pages 50; 57-58; 62-63; 71-72	
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	pages 47-53; 71-72	
	NON-DISC	RIMINATION		
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	pages 42-43	
	103-2	The management approach and its components	pages 57-58; 62-63	
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 62-63	
GRI 406: Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	page 63	

GRI STANDARD	DISCLO	SURE	PAGE (OR DIRECT REFERENCE)	OMISSION		
	FREEDO	M OF ASSOCIATION AND COLLECTIVE BARGAINING				
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	pages 42-43			
	103-2	The management approach and its components	pages 57-58; 62-63; 80			
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 62-63; 80			
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	pages 63; 92-93			
	SUPPLIE	R SOCIAL ASSESSMENT				
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43			
Management	103-2	The management approach and its components	pages 57-58; 92-93			
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 92-93			
GRI 414: Supplier Social Assessment 2016	414-2	Negative social impacts in the supply chain and actions taken	pages 92-93			
	CUSTOM	ER HEALTH AND SAFETY				
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43			
Management	103-2	The management approach and its components	pages 57-58; 90-91			
Approach 2016	103-3	Evaluation of the management approach	pages 57-58; 90-91			
GRI 416: Customer Health and Safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	page 91			
Topics not cov	ered by t	he topic-specific Standards				
	PARTNERSHIP WITH MULTINATIONAL GROUPS					
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	pages 42-43			
	103-2	The management approach and its components	pages 33; 57-58			
	103-3	Evaluation of the management approach	pages 33; 57-58			
	CUSTOMER SATISFACTION AND CUSTOMER SUPPORT					
GRI 103:	103-1	Explanation of the material topic and its Boundary	pages 42-43			
Management	103-2	The management approach and its components	pages 39; 57-58; 91			
Approach 2016	103-3	Evaluation of the management approach	pages 39; 57-58; 91			