



SUSTAINABILITY POLICY – ESG PRINCIPLES

PREMISE

The Sustainability Policy (the “Policy”) of SPIC Srl (hereinafter, “SPIC”, or the “Company”) was developed with the aim of spreading the principles of environmental, social and governance sustainability (hereinafter also “ESG”) in the awareness that economic and business activity generates direct and indirect impacts on human rights, on the environment in which it operates and on society.

In particular, this Policy is functional to the identification, evaluation and management of ESG factors, which may involve both risks and opportunities, for the achievement of corporate objectives.

SPIC's sustainability strategies pursue continuous improvement of environmental, quality and occupational health and safety aspects, in compliance with the Company's inspiring Values and with what is indicated in the Code of Ethics, in accordance with the Sustainability Model provided for by the United Nations Global Compact.

SPIC is attentive to issues relating to quality, business ethics and social responsibility. It has adopted the Organization, Management and Control Model pursuant to Legislative Decree no. 231/01, the Code of Ethics and has established a quality management system (SGQ) obtaining UNI EN ISO 9001 certification.

Similarly, the Company has been promoting environmental protection and workplace safety for years and, in this context, has obtained the UNI EN ISO 14001 certification - Environmental management system - and the UNI EN ISO 45001 certification - Occupational health and safety management system.

SPIC operates in firm respect and support of the contents of the “Universal Declaration of Human Rights”, the “International Labour Organization Declaration on Fundamental Principles and Rights at Work”, the “Rio Declaration on Environment and Development” and the “United Nations Convention against Corruption”.

RECIPIENTS

The recipients of this Policy are the corporate bodies and all persons linked by employment relationships with the Company and with the companies belonging to the Group to which it belongs, as well as all those who work for the Group.

GOALS, COMMITMENTS AND FIELDS OF APPLICATION

ESG Objectives and Material Themes

The objective of the Sustainability Policy is to define the strategies and guiding principles of sustainability, with a specific focus on the following issues which, for SPIC, have been assessed as materially relevant as they have an impact on ESG (Environmental, Social, Governance) aspects:



1. Technological efficiency of means and equipment;
2. Reduction of the environmental impact of activities;
3. Customer satisfaction;
4. Operational and financial capacity and continuity;
5. Staff training and skills;
6. Business ethics;
7. Respect for human rights;
8. Protection of workers' health and safety;
9. Protection of the health and safety of the communities affected by the company's activities;
10. Efficiency, image and reputation of the Company on the market.

ESG Commitments

The Sustainability Policy is implemented through the following areas of action:

Environmental

SPIC is committed to minimising and optimising the impact that its activities generate on the environment - directly and indirectly - in the short and long term and to constantly monitor the risk factors linked to environmental aspects.

In particular, SPIC is active in the use of processes and technologies aimed at reducing consumption and greenhouse gas emissions, to contribute to the mitigation of climate change.

With regard to direct impacts, the Company raises awareness among its employees towards a responsible use of resources and towards correct waste disposal.

SPIC is also committed to monitoring in an increasingly structured way its indirect impacts, strictly connected to its operations.

These principles are to be considered valid both within the Company and externally, through the offer of products capable of generating positive environmental impacts and triggering virtuous behaviors.

Among the material themes of SPIC's commitment, those regarding environmental aspects are:

- Technological efficiency of means and equipment;
- Reduction of the environmental impact of activities;
- Staff training and skills.

Within the aforementioned themes, SPIC undertakes to:

- promote the use of the most advanced technological means to achieve excellence in the protection of workers' health, safety at work and environmental protection;
- assess and reduce the environmental impact of its activities on the territory and the communities involved;
- use resources responsibly with the aim of achieving sustainable development that respects the environment and the rights of future generations; implementing organizational measures aimed at minimizing polluting emissions, waste production, consumption of available natural resources and the causes of climate change;
- reduce the environmental impact of its activities, reducing energy consumption, atmospheric emissions and waste production, also by improving the quality and efficiency of its plants, as well as through the assessment and prevention of environmental risks, allowing the identification of appropriate action plans;



- develop and implement emergency management programs to prevent and avoid harm to people and the environment in the event of accidents;
- implement organizational measures to minimize polluting emissions, waste production, consumption of available natural resources and the causes of climate change, in order to preserve the environment and biodiversity;
- promote and disseminate concepts relating to environmental sustainability among employees, collaborators, partners and stakeholders;
- progressively improve the environmental efficiency of its fleet.

Social

SPIC's sustainable approach is also reflected in its policies for the protection and development of Human Capital. The achievement and maintenance of these principles are also pursued through monitoring compliance with the principles recognized by the Universal Declaration of Human Rights and the declarations of the International Labor Organization.

In the awareness that the active contribution of all people is fundamental to achieving the objectives indicated above, SPIC pursues continuous and targeted information, awareness and training.

Relationships between people in SPIC are based on the values of fairness, transparency, freedom, loyalty and trust.

In this context, SPIC has always been committed to offering working conditions that respect personal dignity, human rights, and equal opportunities by creating a professional and participatory working environment.

Among the material themes of SPIC's commitment, those that concern social aspects are:

- Respect for human rights;
- Protection of workers' health and safety;
- Protection of the health and safety of the communities affected by the company's activities;
- Staff training and skills.

Within the aforementioned themes, SPIC undertakes to:

- promote the use of the most advanced technological means to achieve excellence in the protection of workers' health, safety at work and environmental protection;
- govern their activities in terms of health, safety and rights at work, and the environment, in compliance with the most qualified international standards;
- identify, evaluate and prevent risks to health and safety at work aimed at continuously reducing the number and severity of accidents and occupational diseases, activating health surveillance plans in order to protect workers from the specific risks associated with their company duties;
- conduct the personnel selection process in full respect of diversity, equal opportunities, heterogeneity and non-discrimination, avoiding favoritism and facilitation of any kind;
- promote the management and development of its people by providing specific programs aimed at enhancing their talents in all roles and levels of responsibility;
- ensure the well-being of workers and preserve the balance between private and working life;
- not use or support the use of child labor or forced labor;



- ensure equal opportunities and freedom of association, promoting the development of each individual;
- oppose the use of corporal punishment, mental or physical coercion, verbal abuse;
- comply with laws and collective agreements on working hours by ensuring wages sufficient to meet the basic needs of staff;
- empower, train and motivate its workers to work safely and in compliance with safety and the environment, involving all levels of the organization in a continuous training and information program, aimed at promoting the culture of safety at work and respect for the environment and ensuring that company responsibilities and procedures in these areas are appropriately updated, communicated and clearly understood and implemented by all personnel.

Governance

Ethics and integrity in managing relationships with legitimate stakeholders are the foundation of SPIC's way of doing business.

Maintaining and protecting its reputation is essential for SPIC to be properly perceived as an honest and reliable partner by all its stakeholders.

In particular, SPIC is committed to preventing corruption through the formalisation of adequate rules of conduct, procedures and control tools for the ex ante and ex post verification of the ways in which business is conducted, in order to prevent and eliminate any type of unethical behaviour and risk of corruption.

To this end, SPIC's activities comply with the laws and regulations of the individual countries in which it operates. SPIC also complies with international conventions on the subject, implementing appropriate measures to prevent and combat corruption and illegal practices.

The Company has adopted an Organization, Management and Control Model pursuant to Legislative Decree 231/01, a Code of Ethics, a code of conduct towards the Public Administration, an anti-corruption code part of Model 231/01 and a Protocol for the Prevention of Corruption in compliance with the provisions of the ANCE-Ministry of the Interior Legality Protocol to which it has adhered., in order to mitigate reputational risks and prevent the commission of the predicate crimes provided for by Legislative Decree 231/2001, by defining a series of principles of behavior and rules of conduct to be followed, promoting lawful behavior and prohibiting unfair practices.

To this end, SPIC does not tolerate any form of corruption or unethical conduct, considering it a risk for a sustainable development economy and for good governance. SPIC is committed to raising awareness and, where necessary, training all stakeholders, suppliers and partners, as well as developing adequate procedures.

SPIC adopts a governance system oriented towards the control of business risks, transparency towards the market and the balancing of the interests of all stakeholders.

SPIC condemns any phenomenon of corruption, extortion, undue inducement to give or promise benefits and adopts all the most appropriate measures in order to prevent and avoid the commission of such crimes. The Company is active in the fight against both public and private corruption and, for this reason, requires all its collaborators to adopt ethical behaviors that contrast the occurrence of corrupt episodes.

The dedication and professionalism of employees are considered key values and conditions for achieving business objectives.

To these ends, SPIC undertakes to:

- manage its supply chain responsibly, establishing adequate procedures necessary for the selection and evaluation of suppliers and sub-suppliers, in compliance with the provisions of the Organization, Management and Control Model pursuant to Legislative Decree 231/01 adopted by the Company.
- evaluate as criteria for supplier selection the level of social responsibility, management of environmental, health and safety issues and existing certifications such as the adoption of a system compliant with the ISO 9001 quality management system.
- Evaluate ethical aspects as a criterion for supplier selection by carrying out preliminary due diligence on the counterpart, evaluating the requirements of honorability, professionalism, ethics and integrity, both in the initial phase and periodically during the continuation of the relationship.
- Ensure regulatory compliance of the subjects collaborating with the Company also with reference to what is required in the context of contracts with the Public Administration (e.g. Legality Protocol, registration in the White List and further obligations required by the Anti-Mafia Code, Legislative Decree 159/2011, and by the Public Procurement Code, Legislative Decree 36/2023).
- not tolerate any type of corruption in any form or manner, in any jurisdiction, even where such activities are in practice permitted, tolerated or not prosecuted;
- involve all personnel and all levels of the organization, ensuring that responsibilities and operating procedures are clearly defined, appropriately communicated and clearly understood by all personnel;

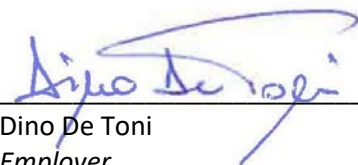
DIFFUSION

This policy is disseminated to all employees of the Company and made public for the benefit of all stakeholders.

Castelfranco Veneto, 04 July 2024



Giancarlo Zanuttini
Chairman of the Board of Directors



Dino De Toni
Employer