

INTEGRATED MANAGEMENT SYSTEM POLICY (SGI)

Sidastico S.p.A. is a sheet metal service center specialized in the leveling, cutting and processing of carbon steel sheets made to measure from hot-rolled coils, with over forty years of experience.

The management of Sidastico S.p.A. has identified the search for the realization of expectations and the increase in the satisfaction of interested parties: customers, employees, owners, suppliers and the community in general, as the best way to pursue the consolidation and affirmation of the company's growth.

This research goes through a rationalization of the internal organization, both from a production and functional point of view, which sees as a normal development an integrated Quality-Environment-Safety Management having as references, as far as applicable, the following standards:

- UNI EN ISO 9000:2015
- UNI EN ISO 9004:2018
- UNI EN ISO 14004:2015
- UNI EN ISO 45001:2018

and as certification standards of the Management System:

- for Quality: UNI EN ISO 9001:2015
- for the Environment: UNI EN ISO 14001:2015

The success of the company is the result of:

- entrepreneurial capacity;
- consistency of product quality;
- wide range of products available;
- large fleet of latest generation levellers and cutting-edge technologies;
- short supply times;
- documented information that complies with regulations and customer requirements;
- competence and flexibility of the staff;
- constant improvement of the environment in terms of available spaces and safety;
- sustainable development of the organization, environmental protection and pollution prevention.

The Management of Sidastico S.p.A. has the following objectives:

- to comply with the principles of Accountability and Conformity to Obligations and Law, Fairness, Honesty, Integrity, Transparency, Efficiency, Impartiality and protection of human rights;
- to meet customer requests while ensuring compliance with quality standards;
- to protect the environment through continuous analyses and monitoring of emissions into the atmosphere, water and waste disposal;

- to recognize human resources as a fundamental factor for business development, protecting professional growth and development in order to increase the company's wealth of skills;
- to increase the involvement and interest of employees through team building operations;
- to update production and control technologies and processes;
- to monitor the efficiency of the plants;
- to develop the integrated planning of quality, environmental and social responsibility management systems, taking into account the objectives and targets of the Management;
- to ensure the selection and evaluation of suppliers on the basis of quality and sustainability requirements;
- to periodically review the management system to identify opportunities for improvement and ensure compliance with the requirements of the standards (ISO 9001, ISO 14001);
- to continuously improve the management of the System through staff awareness, the automation of operations, the adoption of management methods such as Lean management and continuous supervision by the Management through internal Managers, the integration of sustainability issues into business processes;
- to develop and pursue environmental, labour and human rights, occupational health and safety policies within the framework of values defined in the code of ethics, which are an integral part of the Company's policy.

The Chairman Executive Officer
Davide Chilò

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ENVIRONMENTAL POLICY

Scope of the Environmental Policy and Scope

The purpose of this policy is to deepen and develop environmental issues in line with the Company policy. This policy applies to all activities of Sidastico S.p.A..

The Company may adopt stricter rules and procedures, as necessary and in accordance with local laws and regulations.

Our approach to environmental protection

We base our business on the compliance with the values set out in this policy and in our ethical code, in the belief that business conduct cannot be separated from ethical and environmental protection aspects.

Environmental sustainability does not simply mean more efficient energy consumption and reduced greenhouse gas emissions, but in a broader sense it also means having a more harmonious relationship with nature. This translates into a deep sense of responsibility in the use of the resources necessary for the proper performance of the Company's activities as well as in the management of the consequent impacts.

Sidastico S.p.A. is therefore committed, by making human, instrumental and economic resources available, to define and pursue the objectives of continuous improvement of its environmental impact as an integral part of its business and as a strategic commitment with respect to the more general purposes of the Company.

Goals and commitments

Legislative compliance

We are committed to constantly monitor regulatory developments in the environmental field, to ensure that our standard and newly implemented processes at our sites are always compliant with the applicable legal requirements.

We constantly monitor our activities to ensure effective compliance with laws and regulations and to prevent any illegal practices.

Reduced environmental impact

We are committed to reducing the overall environmental impact of our production processes and products by encouraging the adoption of a life cycle approach in all processes from the design stages. We are committed to monitoring and reducing the overall impact of our emissions into the air, water and soil with particular attention to limiting greenhouse gas emissions, to virtuously managing the internal waste disposal cycle by prioritising its reduction, reuse and recycling, and to protecting the biodiversity of the areas in which we operate. We enforce a policy based on the responsible and compliant management of

all hazardous materials, replacing them, where technically possible, with products with a lower impact on the environment and human health.

We are currently focused on the following key environmental objectives:

- **energy efficiency and renewable energy:** limiting energy consumption, favouring efficient solutions and the dissemination of a culture of energy saving in order to reduce the group's general impact on climate change. Adopt all the necessary measures to analyse the company's energy system and its consumption and define possible improvement interventions in terms of energy efficiency. In addition, Sidastico S.p.A. is focused on the progressive increase in the use of renewable sources for energy production;
- **greenhouse gas emissions:** limiting emissions of air pollutants (greenhouse gases) by adopting the best available technology and respecting environmental regulations. The company is committed to measuring and monitoring its emissions into the atmosphere annually and to constantly reducing direct and indirect greenhouse gas emissions.
- **water consumption and quality:** the Company periodically monitors the amount of water used in order to analyse consumption trends. The company is committed to promoting a reduction in waste and a conscious management of water resources.
- **air quality:** the Company periodically carries out analyses of emissions from its chimneys in accordance with current legislation in order to monitor the trend of its emissions and promote a reduction in the impact of its activities on the atmosphere. The Company also intends to incentivise, among its initiatives for improving air quality, electric mobility, public mobility and car-sharing among its employees.
- **resource management and waste reduction:** promoting efficient waste management and disposal of used materials, maximizing recycling and reuse and minimizing the total resources allocated to landfill. In compliance with current legislation, the Company draws up an annual report of waste by type and disposal.
- **management of chemical substances:** the Company is committed to informing and training personnel to manage the risks associated with chemicals and to prevent disasters and accidents with negative consequences on human health, the ecosystem and the environment.
- **support for biodiversity:** the Company intends to minimize its impact on the ecosystem by ensuring that, before taking any type of action that may have an impact on biodiversity such as, for example, the creation of a new production plant or a new type of processing, an environmental impact assessment is carried out.

Continuous improvement

We are committed to promoting environmental protection and reducing the environmental impact of our operations by establishing improvement programs with short, medium and long-term objectives and targets. To this end, we want to ensure environmental protection wherever technically possible and economically viable.

Responsible supply chain management

We promote environmental protection and management throughout our production chain, involving our business partners, suppliers and contractors as key players in our sustainability policy by encouraging and supporting them to improve their performance, supporting a circular economy and promoting the principles of sustainability in the procurement choices of goods, products and services. The legal requirements of suppliers, where applicable, are also verified through the acquisition of information through questionnaires.

Staff awareness

We are committed to involving our staff, at all levels, in the implementation of the environmental policy through all appropriate measures and initiatives. These include information and training activities, specifically aimed at promoting environmentally friendly behaviour, strict compliance with legal requirements and internal procedures, and ensuring that this policy is followed at all levels within the group.

Monitoring and communication

The Company, through its highest representatives and their delegates, is committed to monitoring and reducing environmental impacts. The Company is committed to establishing and maintaining documented procedures to monitor and measure, on a regular basis, key characteristics of its operations and activities that may have a significant impact on the environment. This must include recording information to monitor performance, relevant operational controls, and compliance with the organization's environmental goals and targets.

We are committed to making our environmental policy document accessible to all stakeholders, internally and externally.

Finally, we are committed to making public the relevant information on environmental aspects and impacts through the preparation and annual publication of the Sustainability Report, containing the performance indicators for the activities planned and carried out by the group in environmental matters.

LABOUR POLICY AND HUMAN RIGHTS

Purpose of the Labour and Human Rights Policy and Scope

The purpose of this policy is to deepen and develop social responsibility issues in line with the Company policy. This policy applies to all workers, offices and activities of Sidastico S.p.A.. The Company may adopt stricter rules and procedures, as necessary and in accordance with local laws and regulations.

Principles

The enhancement of safety at work and respect for human rights are essential values on which the Sidastico's culture and strategy are based. For this reason, Sidastico S.p.A. has defined a Code of Ethics, made public not only to all *stakeholders* but to anyone who has an interest in viewing it. This Policy defines the ways in which the principles contained in the Code of Ethics are applied. Sidastico S.p.A. is committed to contributing significantly to the dissemination of awareness of the importance of the principles contained in this Policy. The Policy incorporates international conventions such as the International Bill of Human Rights, including the United Nations (UN) Universal Declaration of Human Rights and the fundamental Conventions of the International Labour Organization (ILO). Sidastico S.p.A. commits to comply with all the principles contained in these agreements. Sidastico S.p.A. is committed to respecting the four core labour standards of the ILO, as set out in the Declaration on Fundamental Principles and Rights at Work:

- Freedom of association and the right to collective bargaining
- Elimination of all forms of forced or compulsory labour
- Effective abolition of child labour
- Elimination of all forms of discrimination in employment and occupation

Sidastico S.p.A. is committed to adopting and disseminating the principles on human rights set out in this Policy and in other documents, including the Code of Ethics, the Sustainability Report and the other policies adopted by the Group. With this Policy, Sidastico S.p.A. reaffirms its values and guidelines that must inspire the choices and behaviors of all those who work in the Company, regardless of level, experience and position held, whether they are direct employees or of subsidiaries, in all the countries in which it operates, provided that they are within the legal boundaries of the company. Highly qualified personnel and high process standards are a fundamental asset for the company's success and are key factors within an extremely complex value chain. The strengthening of attention to human rights, especially in the workplace, testifies to how for the Company people are at the center of every business process and every economic and commercial relationship. The Company also encourages its suppliers to adopt and comply with this Policy.

Goals and commitments

Forced labour and child labour

Sidastico S.p.A. rejects the use of forced or compulsory labour and guarantees working conditions that comply with the laws and regulations in force. The performance of work, both ordinary and extraordinary, is the free expression of the will of the workers and is free of any form of physical and/or psychological coercion. Sidastico S.p.A. refuses to use any form of child labour, not employing in its factories any person who has not reached major age.

Freedom of association and collective bargaining

Sidastico S.p.A. recognises that its employees have the right to form associations for the protection and promotion of their interests, as well as the right to be represented by trade unions or other forms of representation, according with the legislation and practices in force in the various countries in which they are employed. Collective bargaining is recognised as a privileged tool for determining the contractual rules and conditions of its employees, as well as for regulating relations between the Company and the trade unions. Sidastico S.p.A. is committed to ensuring that employees' representatives are in no way penalized or subjected to any form of retaliation. Sidastico S.p.A. undertakes to apply the National Collective Labour Agreement of its sector in all its parts to every worker directly or indirectly employed. Sidastico S.p.A. keeps a continuous dialogue with the workers' trade unions and directly with the workers themselves through meetings and interviews.

Fair and equitable working conditions

Sidastico S.p.A. believes that remuneration policies, benefits and working conditions must guarantee an adequate standard of living for all workers, for this reason in Sidastico S.p.A. the minimum wage of employees is not lower than that established by collective agreements and regulations in force. In addition, Sidastico S.p.A. adopts a bonus system for workers based on company performance.

Health and safety in the workplace

For Sidastico S.p.A., the protection of the fundamental rights of the person is essential in any manifestation of social coexistence, starting with the right to work in environments and conditions suitable for ensuring the health and safety of workers. Sidastico S.p.A., as indicated in the Occupational Health and Safety Policy, is committed to ensuring healthy and safe working conditions and to promoting the dissemination and consolidation of a culture of safety among all workers, including in the supply chain. Sidastico S.p.A. is committed to ensuring that all activities are planned and carried out in order to preserve the health and safety of workers and to guarantee the highest standards. Sidastico S.p.A. defines appropriate indicators to evaluate the effectiveness of its prevention actions. Sidastico S.p.A. has defined an analysis of the risks for the health and safety of workers; depending on the risks, it undertakes to implement the appropriate preventive measures and to provide workers with all the appropriate protective equipment free of charge.

Rights of local communities

Sidastico S.p.A. is committed to respecting the rights of the communities in which it operates and to reducing the social and environmental impact of the activities developed in the production sites. It contributes to the social and economic growth of communities and is committed to implementing behaviour that respects the contexts in which it is located and to exert a positive influence on the territories, through dialogue and collaboration with local authorities and representatives of civil society and through support,

including economic support, for social, sporting and cultural initiatives that respond to corporate values. Sidastico S.p.A. acts to build a solid cooperative relationship with its stakeholders, with the aim of creating long-term value and opportunities for growth and development, as well as to promote open and transparent dialogue and relationships based on mutual trust.

Non-discrimination and equal opportunities

Sidastico S.p.A. rejects any form of discrimination based on ethnicity, skin colour, gender identification and expression, age, disability, sexual orientation, religion, political opinions, nationality, social origin, political or trade union orientation and membership and is committed to maintaining a work environment free from any form of violence or harassment. For Sidastico S.p.A., diversity is a strategic element for the company's competitiveness and the development of its people. The Company believes that teams with different skills, experiences and backgrounds enrich the work environment and stimulate creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture.

Non-discrimination, equal opportunities and inclusion permeate the values of Sidastico S.p.A..

For these reasons, Sidastico S.p.A. undertakes to:

- create an inclusive work environment that ensures respect, integrity, personal development and equal opportunities (e.g. training, development, career), not only for current employees, but also for prospective ones,
- increase employees' awareness of diversity and equal opportunities within the Company, including through the development of training programs and specific projects on diversity and inclusion,
- comply with rules and laws on equal opportunities,
- to encourage the commitment of all collaborators to act with respect and integrity in every relationship with colleagues, customers, suppliers and with all the actors with whom they interact,
- stimulate the attention of suppliers to respect human dignity declined in the form of non-discrimination and protection of diversity.

Education and career

Sidastico S.p.A. is committed to guaranteeing all its workers, without any form of discrimination, with the opportunity to improve their working career according to their skills and talents. Sidastico S.p.A. is committed to training its staff in order to increase their skills, develop their inclinations, and improve their working conditions with a view to work-life balance.

Monitoring and Review

The Labour and Human Rights Policy will be subject to periodic reviews to ensure its effective implementation and adequacy, and will be adapted to any changes in the external and internal context.

HEALTH AND SAFETY POLICY

Purpose and scope

The purpose of this policy is to deepen and develop occupational health and safety issues in line with company policy.

The policy is applied to all workers under the control of the organization.

Principles

Sidastico S.p.A. believes that the protection of the health and safety of workers is a fundamental element to ensure the Company continuous growth and high levels of performance in terms of service and product quality. Sidastico S.p.A., therefore, undertakes to ensure the continuous improvement of its safety policies for the protection of workers' health in accordance with the provisions of the Code of Ethics.

To this end, Sidastico S.p.A. has defined the general objectives for the protection and interests:

- of the Company's internal staff, who must carry out their duties in a safe and healthy environment and who must be aware of the risks they may incur in the performance of their daily duties
- of suppliers, who must safely carry out any activities within the Company premises
- of customers and of suppliers visiting the Sidastico S.p.A. headquarters.

Goals and commitments

Organisational compliance and worker protection

The management undertakes to provide the necessary means and resources to:

- Meet** the requirements established by the Laws and Regulations on Health and Safety at Work applicable to Sidastico S.p.A., with particular reference to the provisions of the following provisions:
 - Legislative Decree no. 81 of 9 April 2008 "Consolidated Law on health and safety at work"
 - Ministerial Decree of 10 March 1998 "General criteria for fire safety and emergency management in the workplace"
 - Prime Ministerial Decree of 14 March 2020 "Shared protocol for the regulation of measures to combat and contain the spread of the Covid-19 virus in the workplace"
- Examine** its production processes, identifying areas at risk and potential for improvement, in order to prevent accidents and illnesses at work;
- Minimize** as much as possible the risks induced by its activities;
- To guarantee** the efficiency and safety of the machines used and the systems built;

- e) **Involve** all personnel, through their representatives, to make them responsible for the correct management of Health and Safety at work;
- f) **Ensure** that all personnel are adequately trained in relation to the risks associated with their duties;
- g) **Disseminate** this policy and the objectives established by management to employees;
- h) **To disseminate** this policy to contractors and visitors;
- i) **Ensure** the correct management of emergency situations to contain and minimize the effects of the dangers that may arise from such situations;
- j) **Periodically review** the Policy and Objectives, as well as the related implementation programs and give them adequate visibility within the Company.

How to achieve goals

In order to achieve the goals listed above, Sidastico S.p.A. operates as follows:

- a) **Standards, regulations and DVR** - Ensures compliance with the laws and regulations in force by setting the Risk Assessment Document (DVR), integrating the original document with specific attachments (e.g. DVR integration - Covid-19 protocol), updating, within the deadlines set by Legislative Decree 81, the sections dedicated to risk assessment, deriving in particular from: vibrations, repetitive movements and manual handling of loads. In the event of significant changes in production processes, the noise risk assessments, the chemical risk assessments or the DVR itself are also updated.
- b) **Technological solutions** - Analyzes and, where possible, adopts technological solutions such as the introduction of robotics to reduce repetitive movements of operators and the use of lifting and load handling equipment (jib cranes, electric pallet trucks, overhead cranes) to reduce the manual handling of loads;
- c) **Equipment** - Purchases solely CE marked equipment, adopts personal protective equipment aimed at reducing any risks and ensures its delivery to operators, studies and adopts work procedures aimed at minimizing the risks of operators, always assesses in advance the implications regarding Occupational Safety and Health of new processes or new systems to be installed;
- d) **Maintenance** - Manages and monitors the periodic checks and maintenance of production equipment and plants, through specific schedules drawn up on the basis of the indications provided by the manufacturers' use and maintenance manuals and the timing required by the applicable regulations with regard to fire-fighting equipment, load lifting and heating and air conditioning systems;
- e) **Meetings** - Organizes periodic meetings with the Workers' Safety Representative (RLS), the competent doctor, the external RSPP and the internal ASPP in order to discuss any critical issues and suggestions for improving the Health and Safety of workers;
- f) **Training** - Establishes and keeps updated training and awareness programs for all personnel regarding the specific risks associated with their duties and on topics of common interest relating to Health and Safety at work. It also establishes classroom or e-learning training interventions to spread knowledge of this Policy;
- g) **Contractors / suppliers** - Ensures the dissemination of the Occupational Health and Safety Policy to contractors who have to carry out activities within the Sidastico S.p.A. offices, attaching it to the DUVRI document (Interference Risk Assessment Document) and publishing it on the company website for dissemination to potential customers and external visitors;

h) **Responsibility** - Develops safety procedures that clearly define those responsible for managing emergencies, the rules that operators and guests must follow in the event of emergency situations, the alarm systems and the means of intervention provided for the correct management of emergency situations;

i) **Management Review** - Implements the periodic Management Review provided for by the Company Quality Management System by inserting the aspects of occupational safety management taken into consideration in this Policy and assessing the state of achievement of the defined objectives.

The Management Review is the articulated document containing all the assessments of the performance of the Integrated Management System, divided into:

- Input elements
- Output elements

Diffusion of the Policy for Quality, Labour and Human Rights, Quality, Environment and Safety

The Management considers essential that this Policy be used as a tool for involvement and guidance for all the people who work for Sidastico S.p.A. or on its behalf or who, in some way, are affected by its activity.

To this end, it is disseminated in the following ways:

- accessible on the monitor at the entrance of the office building;
- accessible directly from this manual, whose link is present in every monitor of the plant;
- visible directly on the bulletin board in the locker room area;
- accessible via a special link on the www.sidastico.com website.