

 **Sede Legale:**
Strada Statale 45 bis
26010 Robecco d'Oglio(CR) - Italia
 +39 0372 9801
 +39 0372 921538

 sales@ilta.arvedi.it
 ilta@pec.arvedi.it

 www.arvedi.it

Cap.Soc. € 34.850.400 i.v.
interamente versato
Società soggetta all'attività di
direzione e coordinamento di
Finarvedi S.p.A.

Società con Socio Unico
Part.IVA IT 00883040198
Cod.fisc. 00883040198
REA CR 119060

DOCUMENT QGAS 530.01 REV. 7

SUBJECT: INTEGRATED POLICY

The Integrated Policy for Quality, Environment, Safety and Energy, defined by the General Management of Ilta Inox, documented and made available to all employees, the public and interested third parties, is strongly oriented towards ensuring the reliability and safety of the Quality of its products, to preserve and protect the environment at every stage involving the life cycle of its product, to reduce possible risks to the health and safety of workers and all personnel in the Company and to optimize energy consumption by limiting waste.

The responsibility for the management of the Integrated Management System (IMS) concerns the entire company organization, from the Employer to each worker, each according to his or her own attributions and skills.

To this end, the Company has implemented and maintains an active and documented Integrated Management System for Quality, Environment, Energy and Safety in compliance with the UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018 and UNI CEI EN ISO 50001 standards.

The company confirms its attention to environmental, energy and climate change aspects; therefore, in 2023 Ilta Inox implemented the calculation of the CFP of its main productions by obtaining UNI EN ISO 14067:2018 certification and in 2024 it was UNI EN ISO 14064:2019 certified by assessing its GHG emissions.

In application of the requirements of the ISO standards, a risk analysis was carried out for each factor that may have an influence on the effectiveness and efficiency of the company's activities and an analysis of the contexts involved.

It has also adopted an Organization, Management and Control Model pursuant to Legislative Decree 231/01 (hereinafter Model 231), optional, suitable for preventing the commission of the offences referred to in the decree itself, and a Code of Ethics aimed at expressing ethical commitments and responsibilities in the conduct of business and corporate activities.

The general principles, defined by the Integrated Policy, are:

- Comply with applicable regulations and other requirements signed in the field of Quality, Environment, Energy and Safety,
- pursue full customer satisfaction,
- take care of the continuous improvement of company processes, materials, products, environmental performance, company energy consumption and the working environment, including the machinery and equipment used,
- take care of the continuous improvement of the safety of products, services and the health and safety of workers, with active involvement and constant attention to training on Quality, Environment, Energy and Safety aspects,
- ensure the continuity and reliability of the Quality of its products and the Environmental/Energy compliance of the processes, involving and raising awareness among Suppliers also for the control and improvement of environmental aspects, pertaining to them, on materials and products,
- aim at the protection and preservation of the environmental heritage according to the cradle-to-gate criterion, as well as the minimization and prevention of environmental impacts in compliance with the laws in force with reference to the consumption of resources, the emission of pollutants into the atmosphere, the production of waste, in particular hazardous waste, and process wastewater,
- monitor its GHG emissions and assess possible improvements,
- aim to reduce energy waste by optimizing company consumption,
- aim to reduce the extent of the costs of "non-quality" and the success of the Company,
- aim to reduce possible risks to the health and safety of workers in order to prevent accidents and illnesses and consider health and safety in the workplace as an integral part of company management,
- aim to reduce, if any, non-conformities,
- make available the necessary economic, human and structural resources to ensure the implementation of the provisions of its IMS, with reference to what is indicated in the Policy itself and in the improvement plans
- involve and consult workers, including through their safety representatives, regarding health and safety aspects, and consider the different types of employment contracts,
- define and disseminate within the organization the objectives of the IMS and its implementation programs,
- guarantee its integrity, adopting the obligations expressly provided for by art. 6 of Legislative Decree 231/01,
- establish and/or strengthen controls that allow the Company to prevent or react promptly to prevent the commission of crimes by top management and persons subject to the management or supervision of the former that entail the administrative liability of the Company,
- improve the effectiveness and transparency in the management of business activities,
- to determine a full awareness in the potential offender of committing an offence,

- to raise awareness, with the same purposes, of all those who collaborate, in various capacities, with the Company (external collaborators, suppliers, etc.), requiring them, within the limits of the activities carried out in the interest of the Company, to adapt to conduct that does not involve the risk of committing crimes,
- approve the Code of Ethics with the aim of preventing incorrect conduct or conduct that is not in line with the Company's directives, which is fully integrated with the Company's Model 231.

The objectives are defined through the implementation of the following guidelines:

- Effectiveness and efficiency of its processes and of the IMS in general,
- clear definition of responsibilities and tasks within it, in support of a widespread multidisciplinary approach, and in compliance with universally recognized rights,
- complete environmental compliance with AIA provisions, national and regional laws in force, any directives and internal requirements and other prescriptions signed,
- complete Energy compliance with the National and Regional Laws in force, any directives and internal requirements and other prescriptions signed,
- complete compliance with the quality of the products with the national and international regulations in force and with any specifications required by customers,
- complete compliance in the management of Safety within the site with current legislation, technical standards and other applicable requirements,
- full compliance with the provisions of the law and commitment not to derive profits or advantages from illegal or criminal activities during the performance of their duties,
- willingness to dialogue with Public Bodies, Local Communities, Associations, Customers and other interested parties on environmental issues, protection of the health and safety of workers,
- effective monitoring and management of any internal and external non-conformities of its IMS,
- use of appropriate technology, also paying attention to new technologies available, in order to reduce risks for workers, the consumption of raw materials, in particular dangerous ones, as well as the consumption of energy and natural resources in general, favoring the logic of reuse and recycling of the resources used,
- tendency towards continuous improvement of processes and environmental performance and safety protection by minimizing, where possible, environmental impacts, energy waste and employment risks considered significant,
- research and encourage the reuse of waste with respect to its landfilling,
- competence, active involvement and training of its staff in relation to the management of the Quality System, the Environmental, Energy and Health and Safety aspects of its activities and products.
- the recipients of the Code of Ethics adopted by ILTA INOX S.p.A., who become aware of cases of omission, falsification or negligence in accounting records or supporting documentation, are required to promptly report them to their superior or to the Supervisory Body and/or the Chief Executive Officer.
- search for partners in relation to reputation, reliability, transparency and adherence to the values expressed in this Code of Ethics

- define clear rules, procedures and moral values to be conformed to in order to respect the law and the person with the adoption of Model 231.
- apply the Code of Ethics to employees, contractors, consultants and collaborators in any capacity, to corporate bodies, attorneys and to any person who may act in the name and on behalf of Ilta Inox Spa,
- the Code of Ethics adopted by Ilta Inox Spa is an integral part of and constitutes the implementation of the Organizational and Control Model used for the purpose of preventing crimes committed in the interest or to the advantage of the Company by the subjects indicated by Legislative Decree 231 of 8 June 2001.

The Chief Executive Officer (CEO) is responsible, with the widest collaboration of the Plant Manager, for ensuring that the Integrated Policy is fully implemented, also regarding the consistency of the objectives set out in the improvement plan.

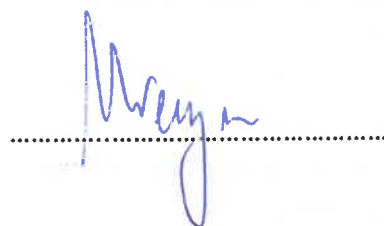
The Company Policy must be reviewed at least once a year by the General Management, through a documented Management Review, in order to verify that it still results:

- **appropriate to the organization implemented,**
- **disseminated, understood and applied at all levels,**
- **achieves the set objectives.**

The authority to establish, implement and keep the Quality, Environment, Energy and Safety Program updated has been assigned to RIMS, chosen from within the Company organization, which has the task of keeping the Management informed of the status and adequacy of the Program and its application.

Disputes or problems that cannot be resolved by the organizational structure will be submitted to the personal attention of the Chief Executive Officer for resolution in accordance with the content of this Manual and the applicable Rules.

The Chief Executive Officer



Robecco d'Oglio, 02/09/2024