

1. INTEGRATED QUALITY, HEALTH, SAFETY & ENVIRONMENTAL POLICY

CE.SUB. s.r.l. is committed to achieving and maintaining the highest standards of quality, occupational health and safety, while ensuring full respect for and protection of the environment.

We are committed to placing our Customers at the heart of everything we do. For this reason, every service must be delivered in line with the customer's explicit and implicit needs and expectations, ensuring their satisfaction and fostering long-term loyalty.

Assessing customer satisfaction, reducing non-conformities, and achieving our quality objectives are just some of the key goals that our organization considers to be of paramount importance.

The definition of our business processes is guided by the pursuit of sustainable, long-term profitability, balancing commercial objectives with a strong sense of responsibility towards society, environmental protection, public safety, and the health and safety of all employees and workers.

CE.SUB. s.r.l. provides all the necessary resources to develop, implement, and maintain an Integrated Management System that complies with the requirements of **UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, and UNI EN ISO 45001:2018.**

The Integrated Policy has been established by the Management of CE.SUB. s.r.l. to guide the actions of all employees and stakeholders in matters relating to **quality, health, safety, and environmental protection.**

The protection of health, safety, and the environment, beyond mere compliance with legal requirements, represents a core value, an essential asset, and a fundamental principle embedded throughout our organization. These principles are deeply rooted in our corporate philosophy and are recognized as an essential and integral part of delivering our services to the highest standards, as well as a key objective in achieving customer satisfaction.

The objectives to which the Company attaches the greatest importance are:

- The protection of workers and public health
- Environmental protection
- The protection of public property and the Company's assets

In its commitment to establishing clear and effective standards that safeguard quality, health, safety, and the environment, CE.SUB. s.r.l. shall:

- Provide and maintain a safe and healthy working environment in compliance with applicable local laws and regulations, as well as internal standards and procedures.
- Ensure that all equipment, machinery, and material used in the various operations are properly put to use, stored, and handled. In a manner that does not pose a risk to people or the environment.
- Ensure that all employees are informed about the regulations of the HSE standards, their practices, objectives, and related procedures. Provide employees with appropriate training and instruction so that they acquire the skills, competence, and knowledge necessary to achieve and maintain these standards.
- Ensure that all employees are aware of their responsibilities towards themselves, others, and the environment. Encourage them to adopt safe and healthy working practices throughout their activities. The same approach shall be required of subcontractors, who shall be selected and assessed; on the basis of their HSE performance and activities.
- Ensure effective and widespread communication through reports, analyses, and information on incident outcomes and resulting impacts. The Company shall implement actions aimed at ensuring regular consultation on health, safety, and environmental issues.
- Adopt a system at all levels, both managerial and operational, capable of establishing and discussing HSE-related procedures, while promoting regular meetings between management and workers' representatives.
- Establish a system of procedures and encourage all personnel to actively participate in matters relating to health, safety, and the environment.
- Regularly conduct audits, investigations, and inspections at the various workplaces and across all activities to ensure compliance with these standards and regulations.
- Assess planned activities, new projects, developments, acquisitions, and modifications in accordance with these standards and requirements.
- Define specific improvement objectives related to each individual's responsibilities and contribution, in alignment with the Company's overall objectives.

CESUB S.r.l. is confident that all personnel will accept and understand this policy and that the HSE Plan will be implemented and followed in such a manner as to maintain the Company among the most successful and highly regarded organizations in the market.

It is the policy of CESUB S.r.l. to be committed to establishing and maintaining a safe, healthy, and productive working environment for all its employees.

The Company recognizes that the abuse or misuse of alcohol, drugs, or other similar substances by employees adversely affects their ability to perform their duties efficiently and may have serious detrimental consequences for their own health and safety, as well as for the safety, efficiency, and productivity of other employees and the Company itself.

The misuse of legitimate medications, as well as the use, possession, distribution, or sale of alcohol, and or illegal or controlled drugs that have not been medically prescribed, on Company premises is strictly prohibited and shall constitute grounds for appropriate disciplinary action, up to and including dismissal.

Although this policy expressly refers to alcohol and illegal drugs, it should also be understood to apply to all forms of substance abuse.

CE.SUB. S.r.l. recognizes alcohol and drug addiction as treatable conditions. Employees who believe they may have a dependency issues involving the above-mentioned substances are encouraged to seek medical advice and undertake appropriate treatment without delay and before their condition adversely affects their ability to perform their duties safely and effectively.

The Company's Occupational Health Service is available to employees who, on a strictly voluntary and confidential basis, wish to seek advice or consultation for any information or for practical assistance aimed at supporting a more effective recovery. Employees who choose to seek such assistance shall be afforded all the protection provided for by applicable laws and contractual regulations, with the utmost respect for their dignity and privacy.

Except as provided in the following paragraph, where an employee's condition of dependence on alcohol or drugs is such that, although it does not result in incapacity for work, it may constitute a danger; in the performance of specific duties, to the employee's own safety, that of colleagues or third parties, or to the safety of equipment and facilities, the Company reserves the right; in accordance with its legal obligation to ensure workplace safety, to reassign such duties within the limits permitted by law.

Where an employee is found, in accordance with the procedures established by law, to be unfit to perform the duties actually assigned as a result of alcohol or drug dependence, even following medical treatment, this may constitute grounds for termination of employment for just cause, where permitted by applicable law.

The assumption of alcohol, drugs, or similar substances during working hours is strictly prohibited. Employees are also strongly advised to refrain from consuming such substances outside working hours whenever their effects may persist and affect their subsequent work performance or ability to work safely.

CE.SUB. S.r.l. reserves the right to carry out unannounced checks for the presence of drugs or alcohol on Company premises and to request, from the relevant employers or competent authorities, the removal from Company premises of third-party personnel whose condition or behavior may constitute a risk as described above.

It is the policy of CE.SUB. S.r.l. to promote mutual respect and to prohibit any form of unlawful harassment based on race, color, sex, religion, nationality, citizenship, age, physical disability or mental disability.

Furthermore, Company policy prohibits any form of harassment; even where it does not constitute unlawful conduct, as such behavior is considered unacceptable in the workplace. The Company expressly prohibits any form of harassment directed towards its employees, as well as employees of contractors, suppliers, or customers.

Harassment is defined as any conduct that has the purpose or effect of:

- Creating an intimidating, hostile, or offensive working environment;
- Unreasonably interfering with an individual's ability to perform their work;
- Adversely affecting an individual's employment opportunities.

Harassment will not be tolerated, whether it occurs in the workplace or during any event organized or sponsored by the Company.

Examples of harassment include, but are not limited to, intimidating behavior, unwelcome verbal or physical advances or conduct, and use of material, statements, or comments that are offensive, derogatory, or discriminatory on the basis of sex, race, or any other protected characteristic.

In the event of harassment of any kind, any administrator, officer, or employee involved shall be subject to disciplinary action, which may include dismissal.

CE.SUB. S.r.l.'s principles and policies concerning health, safety, environmental protection, public safety, and sustainability are fundamental to establishing a strong corporate culture and promoting high standards of conduct among all employees.

From an operational perspective, these principles provide the framework for establishing a management system focused on continuous improvement, going beyond mere compliance with regulatory requirements and striving to optimize safety performance while minimizing environmental impact, with a view to sustainable development.

Accordingly, CE.SUB. S.r.l. conducts its activities in a manner that places the protection and well-being of people working in its offices and at clients' facilities among its highest priorities, while minimizing any potential adverse effects on the surrounding area and the environment.

CE.SUB. S.r.l.'s corporate policy is aimed at continuously improving its organizational capabilities and ensuring the ongoing development and updating of its employees, particularly in terms of their professional growth.

CE.SUB. S.r.l. believes that its Integrated Quality, Health, Safety and Environmental Management System enables the Company to achieve its established objectives while fully respecting the needs and expectations of its stakeholders (including customers, employees, collaborators, the community, and others) and complying with all applicable mandatory legal and regulatory requirements.

This decision is based on the following considerations:

- The Company's growth and market position require an appropriate organizational structure in order to ensure reliability during execution and consistency in the way activities are carried out;
- The complexity of the various activities and business processes requires accurate definition and operational consistency;
- The Company's intention to expand requires the identification of new market opportunities, for which it is appropriate to provide objective evidence of the Company's organizational structure and to ensure consistency and continuous improvement in performance.

CE.SUB. S.r.l. therefore undertakes to:

- Ensure ongoing compliance with applicable laws and other relevant regulations;
- Seek the active contribution of all interested parties in order to improve the Company's performance;
- Seek to optimize business processes in order to achieve the highest possible level of effectiveness and efficiency, consistent with the state of the art.
- Consider the protection of health, safety and the environment as corporate objectives to be achieved and continuously improved through the definition of specific objectives for the various functions and levels of the organization;
- Reduce risks to workers and the impact on the environment arising from services rendered, and take corrective action on operating procedures at every stage of the production cycle;
- Empower and make all personnel aware of their responsibilities and obligations;
- Continuously and effectively monitor the achievement of the Clients' expectations;
- Carry out appropriate management control over the progress of ongoing projects/orders;
- Analyze the final results of completed projects/orders by comparing them with the initial assumptions in order to validate them;
- Maintain certification of the Integrated Management System in accordance with the standards UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and UNI EN ISO 45001:2018;
- Continuously improve the Integrated Management System, ensuring its ongoing compliance with the applicable certification standards;
- Maintain a proactive role for Senior Management in promoting continuous improvement in all areas covered by the Integrated Management System;
- Adapt the functionality of its information systems in line with current technological developments, while ensuring the adoption of appropriate preventive security measures to minimize the risks of loss, unauthorized access, or misappropriation of personal data and confidential information.
- Move from the individual management of information, which leads to unnecessary duplication and inevitable inconsistencies, to the integrated management of data through the company's information system, thereby ensuring that all data becomes a valuable and shared corporate asset;
- Automate and simplify existing manual processes by integrating applications, reducing data-entry costs and shortening the time between the occurrence of an event and its availability as relevant information. This enables all parties to share knowledge and collaborate in real time, while reducing manual activities and the circulation of hard copies, and provides Management with the ability to identify key data and use the resulting information to develop effective strategies;
- Measure company performance through the analysis of collected data and information, as this is essential to driving continuous improvement. The quality of

services provided shall therefore be monitored through systematic process-monitoring activities, while internal effectiveness and efficiency shall be improved by addressing identified issues and implementing market best practices;

- Identify all relevant internal and external stakeholders and incorporate an analysis of their respective expectations into the process of assessing priorities, thereby contributing to the comprehensive definition of appropriate action plans;
- Communicate to all personnel the importance of complying with Customer requirements;
- Ensure the involvement, participation and shared responsibility of all personnel, in order to achieve full understanding and commitment to the company's policy and objectives.
- Build balanced and constructive relationships between managers and employees, promoting cross-functional dialogue and positive interactions with Customers, Suppliers, Institutions and, more generally, with all identified stakeholders, in support of and to ensure the long-term sustainability of the company's value;
- Ensure that the communication and information regarding set activities is within Policy;
- Ensure that all personnel receive appropriate information and training on the requirements of the Integrated Management System and understand the implications of these requirements with regard to their role within the company and their conduct in the workplace.
- Establish planning, control, monitoring and review processes to ensure compliance with this Policy and to guarantee the effectiveness of the Integrated Management System;
- Use Risk-Based Thinking as a strategic tool for awareness and control, aimed both at mitigating all corporate risks and at identifying and consolidating market opportunities, as well as opportunities to improve results and processes;
- Conduct checks, inspections and audits aimed at identifying and preventing potential non-conformities and at promoting corrective and preventive actions.
- Conduct checks, inspections and audits aimed at identifying and preventing any situations that don't conform to the requirements of the Integrated Environmental and Occupational Health and Safety Management System;
- Ensure that contractors working on behalf of the Company adopt the same criteria and standards established by CE.SUB. S.r.l.;
- Select and promote the development of suppliers and contractors in accordance with the principles of this Policy, requiring them to maintain conduct consistent with it;
- Develop and implement safety plans containing the measures and procedures necessary to prevent accidents or emergency situations and to contain their potential effects;
- Provide personnel with training, information and instruction appropriate to their assigned duties, in order to ensure the continuous improvement of health and safety

standards over time;

- Periodically review this Policy and the implementation of the Integrated Management System in order to assess its appropriateness and effectiveness, with the aim of promoting continuous improvement;
- Ensure clear, transparent, understandable and appropriate communication flows at all internal and external levels, consistent with the objectives and content of this Policy. This requirement contributes to creating value for the Company and enables it to understand and respond effectively to the needs and expectations of all interested parties.

The Integrated Policy shall be explained and discussed during orientation meetings with employees, in order to ensure that it is understood, implemented and continuously improved at all levels of CE.SUB. S.r.l.

Furthermore, Management shall ensure that these meetings are held annually and/or following each revision of the Integrated Policy.

This document shall be displayed in appropriate locations throughout the various offices of CE.SUB. S.r.l.

Place and Date

Management

San Giorgio Ionico (TA) lì 07/01/2022