

CORPORATE POLICY

ON QUALITY, HEALTH AND SAFETY AT WORK, ENVIRONMENT, GENDER EQUALITY, AND SUSTAINABILITY



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Tecnosystemi S.p.A. Società Benefit specializes in the design and production of accessories and components for air conditioning, ventilation, air exchange, and the photovoltaic sector. The continuous improvement of internal management processes is considered a strategic and primary objective, achieved through the definition of an Integrated Policy for Quality Assurance (**UNI EN ISO 9001:2015**), Occupational Health and Safety (**ISO 45001:2018**), Environmental Management (**UNI EN ISO 14001:2015**), Data Protection, and a business model based on Sustainability and Transparency. This Integrated Policy outlines the company's strategic goals and directions, the achievement of which requires the involvement of all internal and external stakeholders—adequately trained and informed—within an interdisciplinary approach where all departments work in unison, pursuing business growth and continuous improvement with consistency and commitment through a risk-based approach.



The commitments related to each management system comply with and adhere to the following corporate guiding principles, which represent the company's mission and strategy in the short, medium, and long term. The following sections outline Tecnosystemi's commitments, divided according to each specific management system.

ENVIRONMENT



The Company Management has always placed the utmost attention on the **protection and safeguarding of the surrounding environment**, pursuing the reduction of its impacts through multi-year commitments reported annually. This commitment is formally stated in the Company Statute, where it declares the clear intention to conduct its economic activity with a concrete commitment, in partnership with stakeholders, to **environmental protection and pollution prevention**. This translates into a tangible effort to combat climate change and reduce emissions responsible for global warming.

The Statute also formally indicates the aim of producing responsibly, achieving the development of innovative processes and products, and promoting the adoption of **conscious and sustainable practices**.

In detail, **the three-year plan of commitments includes:**

- Optimization and improvement of energy consumption through the use of 100% certified renewable energy sources;
- Reduction of energy and water consumption;
- Reduction of local pollution through an adequate waste recycling system;
- Analysis of the environmental impacts of products through LCA methodology and EPD certifications;
- Implementation and annual updating of the Organization's Carbon Footprint;
- Periodic drafting of the Plant Energy Audit;
- Study and implementation of Circular Economy processes;
- Purchase, where possible, of virgin and/or bio-based, compostable, biodegradable, recyclable materials or materials derived from recycling processes;
- Progressive reduction of greenhouse gas emissions in its operations, both directly and indirectly, also through the drafting and sharing of a decarbonization plan;
- Study, implementation, and maintenance of an urban forestry project;
- Study and use of sustainable packaging;
- Use of reusable materials for daily cleaning of offices and workspaces;
- Raising awareness among internal staff and external suppliers regarding separate waste collection and proper disposal;
- Implementation of solutions for electric mobility within the company;
- Constant pursuit of compliance with applicable legislation.

QUALITY



The Company Management is committed to fully supporting the process of **introducing, developing, maintaining, and improving a culture of quality through the following actions:**

- Adoption of internal policies and procedures;
- Commercial transparency;
- Product and customer service quality;
- Systematic advanced training of staff professional skills;
- Implementation of advanced management software;
- Traceability of production and all company processes;
- Customer satisfaction as a driving force for company continuous improvement plans;
- Management, timely evaluation, and monitoring of suppliers;
- Customer support throughout the entire sales and installation process;
- Allocation of part of revenues to development plans and introduction of new technologies.

ETHICS



The Company Management is consistently committed to **developing and consolidating transparent relationships** with all stakeholders through the following actions:

- Communicate transparently with all stakeholders with whom the Organization interacts, both internally and externally;
- Create a respectful, fair, and inclusive work environment;
- Ensure equal opportunities in the workplace throughout the employee lifecycle, from recruitment to hiring, training, professional development, and termination, avoiding any form of discrimination based on nationality, gender, religion, age, political orientation, or background;
- Ensure the fulfillment of stakeholder expectations and compliance obligations;
- Adopt, implement, and maintain a Code of Ethics and an organizational, management, and control model in accordance with Legislative Decree 231/2001.

HEALTH AND SAFETY AT WORK



Alongside its commitments to Quality, the Management of Tecnosystemi SpA Società Benefit places the utmost attention on protecting the health and safety of its workers. To achieve these objectives, it has implemented an **Occupational Health and Safety Management System (OHSMS)** as an integral part of its organizational structure.

In detail, **Company Management is committed to ensuring that:**

- Health and safety are considered a priority;
- Information on risks associated with different activities is communicated to all relevant workers;
- Employee training is provided and regularly updated;
- Workers' consultation is guaranteed, including through the Health and Safety Representative, via specific periodic meetings;
- The company structure actively participates, according to its responsibilities and competencies, in achieving annual objectives;
- Cooperation and coordination are promoted among various company resources, as well as with other companies present on site and with the competent authorities;
- Preventive actions and investigations are prioritized to protect workers' health and safety, significantly reducing the likelihood of accidents, injuries, or other non-compliances;
- The Policy, objectives, and implementation of the OHSMS are periodically reviewed to achieve continuous improvement in workplace health and safety levels.

In line with its value system, Tecnosystemi has decided to embark on the path toward adopting a Gender Equality Management System (GEMS) in compliance with UNI/PdR 125:2022, as an effective tool to ensure gender equality, promote and disseminate an inclusive culture, and activate processes capable of fostering **women's empowerment**.

The fundamental principles underlying Tecnosystemi's Gender Equality Policy are:

- Impartiality and inclusiveness;
- Fairness and transparency;
- Enhancement of people;
- Protection of the individual;
- Opposition to all forms of violence and discrimination.

Specifically, **Tecosystemi is committed to:**

- Promoting the development of a culture based on the enhancement of everyone's skills and competencies, encouraging the exchange of ideas, dialogue and sharing, and fostering a corporate culture that values people while respecting diversity and inclusion, through information and awareness-raising initiatives addressed to all stakeholders;
- Implementing transparent processes in the management and development of human resources. Employees are recruited on the basis of their experience, aptitudes and competencies. Recruitment is carried out exclusively based on the match between expected profiles and required profiles. Professional growth, remuneration, access to training and career advancement are designed to ensure the highest standards of fairness and equal opportunities;
- Promoting behaviors and language that ensure an inclusive work environment that respects diversity, including gender diversity;
- Promoting working arrangements that support work-life balance;
- Considering any form of violence, harassment or unwanted behavior that violates personal dignity as unacceptable. All individuals must personally contribute to building and maintaining a climate of mutual respect, showing consideration for colleagues and sensitivity to each individual, within a collaborative and respectful environment;
- Implementing and maintaining a system for managing reports in the event of violations of the principles set out in this policy;
- Promoting stakeholder engagement activities on the themes of inclusion, the prevention of discrimination, and the promotion of gender equality;
- Promoting communication activities and marketing actions, with particular attention to social media, consistent with the commitments undertaken in this policy, avoiding the use of stereotypes and adopting inclusive, diversity-conscious language. For public events, attention is paid to gender balance among panel speakers at round tables, events and conferences organized.

Tecosystemi defines the objectives detailed in the **Strategic Plan through Key Performance Indicators (KPIs)** based on the six thematic areas identified in UNI/PdR 125:2022:

- Culture and strategy: improving the organization's work environment by fostering and supporting inclusion, gender equality and the enhancement of diversity as a driver of shared growth;
- Governance: implementing a governance model aimed at defining appropriate organizational safeguards and ensuring the presence of the underrepresented gender in the organization's governing and supervisory bodies, as well as processes designed to identify and remedy any non-inclusive events;
- HR processes: implementing and maintaining HR processes covering the various stages of the employee lifecycle, based on principles of inclusion and respect for diversity;
- Opportunities for growth and inclusion of women in the company: improving the organization's ability to create gender-neutral access to internal career and growth paths and to accelerate such opportunities;
- Gender pay equity: implementing processes to ensure balanced remuneration;
- Protection of parenthood and work-life balance: implementing policies and initiatives to support employees in their roles as parents and caregivers.

A Gender Equality Steering Committee has been established, and an operational focal point has been appointed, entrusted with responsibility for implementing this Policy through a strategic gender equality plan and a formal commitment to carry out an annual system review.

DATA PROTECTION



Tecosystemi is committed to ensuring the **highest level of data protection** in accordance with EU Regulation 2016/679, through the following actions:

- Developing and promptly updating a company GDPR compliance plan through mapping of processing activities;
- Periodically reviewing the Record of Processing Activities;
- Reviewing and/or integrating any impact assessments;
- Continuously analyzing and updating methods for obtaining consent; consistently reviewing the Company's privacy organizational structure;
- Preparing and periodically updating the regulations for company information systems and data retention procedures;
- Managing privacy aspects related to employee and collaborator relationships;
- Preparing and updating the data breach and incident response procedure;
- Implementing and maintaining over time an IT system for proper management of consents and company data.

To achieve these objectives, Tecnosystemi considers the **involvement of all employees** essential and is committed to sharing this Policy with all staff, ensuring its implementation, and periodically reviewing it to guarantee its suitability even in the presence of internal or external changes to the company context.