

Integrated Policy for Management Systems: Quality, Environment, Energy, Occupational Health and Safety and Information Security

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Introduction

The Integrated Policy for Management Systems: Quality, Environment, Energy, Occupational Health and Safety and Information Security describes Growermetal's objectives and commitments in these areas, taking into account the needs and expectations expressed by all interested parties, as well as the company's activities and purposes.

When defining and managing the Integrated Policy for Management Systems: Quality, Environment, Energy, Occupational Health and Safety and Information Security, Growermetal's Management has ensured that it is:

- ✓ Constantly aligned with Growermetal's strategic objectives
- ✓ Inclusive of Growermetal's commitment to the continual improvement of its performance
- ✓ Inclusive of the commitment to fulfil applicable legal requirements and other requirements
- ✓ Integrated into a structured framework in which objectives for Quality, Environment, Occupational Health and Safety, Energy Efficiency and Information Security are defined and periodically reviewed
- ✓ Inclusive of Growermetal's commitment to the consultation and participation of workers and workers' representatives
- ✓ Communicated and understood within and outside Growermetal and by those working on its behalf
- ✓ Periodically reviewed to ensure its continuing suitability.

Growermetal's Integrated Policy for Quality, Environment, Energy, Occupational Health and Safety and Information Security

Through this document, Growermetal's Management defines and documents the following Policy for Quality, Environment, Energy, Occupational Health and Safety and Information Security, which constitutes the company's strategic direction and is expressed through the following general objectives:

- **The company's success and continuous business growth**
- **Full satisfaction of the Customer and all interested parties (stakeholders)**
- **An ethical approach to business management and compliance with applicable regulations**
- **Continual improvement of the quality of the products and services provided, business processes, occupational health and safety, information security and Growermetal's energy performance**
- **Ongoing consultation and participation of all workers and their representatives**
- **A safe working environment, with regard to the elimination of hazards and reduction of risks, personal protective equipment, plant safety, the management of incidents, near misses and injuries, and the prevention of work-related ill health**
- **Respect for the environment and prevention of pollution, with particular regard to limiting atmospheric emissions, protecting soil and water receptors, sustainable waste management and promoting the circular economy**
- **Achievement of carbon neutrality by 2050**
- **Implementation of an environmental management system in accordance with EN ISO 14001, an occupational health and safety management system in accordance with UNI EN ISO 45001, and an energy management system in accordance with UNI EN ISO 50001.**
- **Implementation of an information security management system in accordance with ISO 27001.**

These objectives shall be pursued through the implementation of the following guidelines:

- ✓ Effectiveness and efficiency of the management system for Quality, Environment, Energy, Occupational Health and Safety and Information Security, and of all business processes

- ✓ Compliance with the Code of Ethics in the performance of all company activities
- ✓ Compliance with mandatory regulations, with particular regard to product standards, occupational health and safety, and environmental protection
- ✓ Fulfilment of compliance obligations, consisting of legal requirements and other commitments undertaken
- ✓ Constant commitment to continual improvement of performance relating to quality, the environment, safety and energy
- ✓ Continuous focus on training and the active involvement of all personnel
- ✓ Effectiveness of the process for identifying hazards and environmental impacts, with the consequent minimisation of risks
- ✓ Clear definition of responsibilities and duties, supporting a multidisciplinary approach to work, with the ongoing participation and consultation of workers and their representatives
- ✓ Effective monitoring and management of any internal and external non-conformities identified
- ✓ Prevention of potential non-conformities through all planning activities and FMEA analyses
- ✓ Production flexibility and compliance with Customer delivery requirements
- ✓ Effective management of special Customer requirements, including product safety, and prompt response to all Customer needs
- ✓ Management of production and design activities in a manner that minimises waste and the impact of resource consumption associated with processes and products
- ✓ Procurement of safe, energy-efficient products and services with a lower environmental impact
- ✓ Promotion within the company, through constant awareness-raising, of a culture aimed at implementing behaviours consistent with the objectives
- ✓ Constant monitoring of performance through appropriate indicators (KPIs)
- ✓ Protection of data and information, including personal data processed as Data Controller and Data Processor, which pass through the technological, physical, logical and organisational infrastructure for the secure management of information within the scope of its activities, thereby preserving information in terms of:
 - Confidentiality: ensuring that information is accessible only to duly authorised persons and/or processes
 - Integrity: protecting the consistency of information against unauthorised changes

- Availability: ensuring that authorised persons have access to information and associated architectural elements when required
- Control: ensuring that information is always managed through secure processes and tools
- Authenticity: ensuring the reliable provenance of information
- Privacy: ensuring the protection and control of personal data.

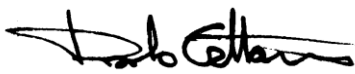
Conclusions

All Growermetal employees are called upon, according to their respective responsibilities, to contribute to achieving the quality, environmental, health and safety, and energy performance objectives defined in this statement.

The management system for Quality, Environment, Occupational Health and Safety, Energy and Information Security requires each of us to be prepared to perform our duties correctly, to be aware of the impact of our actions on product and process conformity, and to participate actively in identifying hazards and assessing risks, proposing measures to reduce them and promoting Growermetal's energy efficiency.

Management is committed to ensuring the availability of the necessary information and resources, verifying the correct application of this Policy through constant supervision of business process results in relation to the objectives defined for the satisfaction of all stakeholders, and monitoring business risks by promptly implementing the actions necessary for their mitigation.

The Board of Directors of Growermetal S.p.A.



Ing. Paolo Cattaneo



Dr. Roberto Cattaneo



Ernesto Cattaneo