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DRAFTING	VERIFICATION	APPROVAL	VALIDATION
CSO & LEGAL	QHSE Manager	General Manager	Supervisory Body


Rev	Description of Change	Reason for change	Date
00	/	I Drafting	18/07/2024

1. INTEGRATED CORPORATE POLICY

- 1.1 WORKPLACE HEALTH AND SAFETY POLICY
- 1.2 ENVIRONMENTAL POLICY
- 1.3 POLICY ON HUMAN RESOURCES MANAGEMENT AND HUMAN RIGHTS
- 1.4 CORRUPTION PREVENTION POLICY
- 1.5 QUALITY POLICY
- 1.6 POLICY ON SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY
- 1.7 POLICY ON SUSTAINABLE PROCUREMENT
- 1.8 POLICY ON DIVERSITY, INCLUSION AND GENDER EQUALITY
- 1.9 ENERGY POLICY
- 1.10 INFORMATION SECURITY POLICY

2. ANNEXES

Seen	Date
CCO	18/07/2024
CFO	
HRD	
Site Engineering MGR	
ID	
CSO&Legal	
Head P&S	
Purchasing MGR	

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1. INTEGRATED CORPORATE POLICY

The Company **Dulevo International S.p.A.** (hereinafter **Dulevo** or the **Company**) is committed to operating in accordance with the principles of sustainable development in order to offer its Business Partners high added value products that contribute, in compliance with applicable laws, to economic progress, the improvement of social welfare and the protection of the environment of the countries in which it operates.

Dulevo is cognisant that it is only through the commitment of all those who work in and for the Company that this is possible:

- to produce complex products by supporting, sharing and applying the Sustainable Development Goals, endorsed by the UN General Assembly in 2015 concerning **Human Rights, Labour Standards, Environmental Protection** and **Anti-Corruption**
- to manufacture products, using the best construction methods and technologies that guarantee, within the delivery time frames agreed with the customer, a **Quality** result that also entails a reduction in operating costs
- to safeguard the health **and safety of workers**, ensuring health surveillance in agreement with the company medical officer, and analysing production activities in detail to identify and prevent events
- to preserve the **Environment**, analysing material aspects in order to prevent possible impacts and using raw materials in a rational and sustainable manner, favouring recovery and/or recycling where possible, encouraging the development and use of innovative technologies in both the design and use phases
- to encourage **Consultation** and **Participation of Workers** and, where established, of workers' representatives, in issues of Health and Safety
- to guarantee the dignity of every worker and offer equal opportunities without any **Gender Distinction** respecting diversity of any kind
- to safeguard **Information Security**, ensuring measures and actions aimed at protecting the confidentiality, integrity and availability thereof

Specifically, the **Integrated Corporate Policy** (hereinafter the **Policy**) defines the commitments that Dulevo's **top management** undertakes in order to improve sustainability results, manage and mitigate ESG risks in line with the Fayat Group's risk management system, and to address ESG impacts generated by business activities and relationships.

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This Policy is structured according to the following main themes:

- Workplace Health and Safety Policy
- Environment Policy
- Policy on Human Resources Management and Human Rights
- Corruption Prevention Policy
- Quality Policy
- Policy on Sustainability and Corporate Social Responsibility
- Policy on Sustainable Procurement
- Policy on Diversity, Inclusion and Gender Equality
- Energy Policy
- Information Security Policy

Dulevo formally requests its business partners and suppliers to ensure conformity with the principles expressed in this Policy.

Dulevo makes this policy available to all stakeholders to ensure they are aware of their commitments made.


1.1 WORKPLACE HEALTH AND SAFETY POLICY

The health and safety of workers are of fundamental importance to Dulevo, which pursues the goal of '**zero accidents**' in the workplace.

In 2023, the Company implemented a Health and Safety Management System aimed at continuously improving work performance for the safety of its employees.

Dulevo's commitment to ensuring the health and safety of all internal and external personnel is demonstrated in the following ways:

- ✓ Compliance with applicable workplace health and safety legislation
- ✓ Provision of safe and healthy working conditions to prevent accidents and occupational illnesses, through defined, clear, and shared procedures that guide operational activities to ensure the correct management of safety aspects identified
- ✓ Elimination of hazards and reduction of risks in the workplace

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- ✓ Ensuring that information on company risks is disseminated to all employees, conducting and updating their training with specific reference to the task performed, in order to promote individual and collective growth of the workforce
- ✓ Encouraging the participation and consultation of workers and their representatives, based on their functions, powers and competencies, in order to achieve the safety objectives assigned

Dulevo guarantees and encourages the consultation and participation of workers on health and safety issues and, where appointed, of workers' representatives.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.

1.2 ENVIRONMENTAL POLICY


The protection, respect for, and safeguarding of the environment are fundamental concepts intrinsic to the culture of Dulevo.

Accordingly, the Company recognises the need for continuous improvement in environmental performance to maintain an efficient programme of activities specifically developed for this purpose, which is identified with the Environmental Management System entrusted to the QHSE Manager.

Dulevo, in order to achieve its goal, commits itself to:

- ✓ Strictly comply with all laws, regulations and other requirements subscribed to in the environmental field
- ✓ Pursue continuous improvement of environmental performance by taking all necessary steps to prevent and reduce pollution
- ✓ Promote the continuous improvement of its products so as reduce dust pollution and use less impactful fuels
- ✓ Promote waste management that adheres to the principles of reduction, recycling and re-use
- ✓ Promote wastewater management that is oriented towards the reduction of pollutants
- ✓ Raise awareness and responsibility among all in-house personnel on issues associated with respect for and safeguarding of the environment
- ✓ Raise awareness among its suppliers on issues associated with respect for and safeguarding of the environment

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.

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1.3 POLICY ON HUMAN RESOURCES MANAGEMENT AND HUMAN RIGHTS

Dulevo confirms its policy that prioritises the central importance of the individual in the organisational context, with a consistent commitment to issues of health and safety at work, and which take concrete form in the development and implementation of proven management systems aimed at continuously improving the key processes that govern the industrial business.

This is confirmed by:


- the refinement of the process of selection and retention of strategic personnel;
- the prevalence of recruitment under open-ended or apprenticeship contracts, within which the training process of resources is guaranteed;
- training and orientation for personnel to ensure continuous growth and development of skills;
- the adoption of an organisational model increasingly aimed at reconciling professional and personal life;
- the implementation of a digital corporate welfare plan with multiple services for employees.

Human Rights

- ✓ Respecting human rights and international labour standards
- ✓ Condemning all forms of child labour and forced labour
- ✓ Selecting suppliers who respect human rights and conducting compliance checks
- ✓ Raising awareness of human rights among employees and partners
- ✓ Working with NGOs and human rights organisations
- ✓ Respecting the right to privacy and security of external stakeholders
- ✓ Promoting open dialogue with stakeholders to address human rights concerns
- ✓ Integrating Corporate Social Responsibility (CSR) principles into business operations

Working conditions

- ✓ Maintaining a fair and transparent remuneration policy
- ✓ Considering new benefits to support the well-being of employees.
- ✓ Promoting a work-life balance with flexible working hours and parental leave
- ✓ Encouraging open communication about working conditions
- ✓ Conducting regular surveys to assess the corporate social environment
- ✓ Informing employees of their rights and responsibilities.

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Social partnership dialogue

- ✓ Recognising and respecting the role of workers' representatives and trade unions
- ✓ Setting up social partnership dialogue committees to discuss relevant issues
- ✓ Organising regular meetings to discuss topics of common interest
- ✓ Sharing strategic information transparently
- ✓ Promoting the collective bargaining process
- ✓ Activating formal conflict resolution mechanisms
- ✓ Providing training on social partnership dialogue issues
- ✓ Evaluating, periodically, the effectiveness of the social partnership dialogue structure

Professional Development

- ✓ Ensuring personalised integration programmes for new employees
- ✓ Promoting continuous training and internal mobility
- ✓ Offering professional development opportunities and mentorship programmes
- ✓ Conduct regular performance evaluations to identify areas for improvement
- ✓ Developing succession plans to ensure business continuity
- ✓ Fostering a meritocratic culture oriented towards stakeholders' needs
- ✓ Supporting the entry of new generations into the workforce.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.


1.4 CORRUPTION PREVENTION POLICY

Dulevo adopts a firm approach of absolute prohibition against any form of corruption and market distortion.

The Company formally commits itself to the obligation to strictly comply with all laws, rules and regulations combating corruption and bribery in Italy and in all countries in which the Company operates.

Dulevo is committed to conducting its business in a manner that always avoids involvement in any corrupt situation or activity, so that it is never implicated in illegal situations in any way, when dealing with public entities as well as private parties.

The Company is firmly committed to developing its business in accordance with the principles of ethics and fair competition within the market in which it operates, counteracting any action aimed at distorting it such as, for example (but without limitation):

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- ✓ commercial fraud
- ✓ conflict of interest
- ✓ money-laundering

In particular, it is strictly forbidden for any employee or collaborator:

- ✓ to offer, promise, give, pay, or authorise anyone to give or pay, directly or indirectly, money or any other financial benefit or favour for unlawful purposes
- ✓ to accept a request or authorise someone to solicit or accept, directly or indirectly, a payment or financial or other benefit or favour from public or private persons
- ✓ to receive or secure the promise of money or other benefits or favours for oneself or others, in exchange for performing or omitting the performance of acts, in breach of one’s duties of office or in breach of trust

All the limitations described apply not only to cash payments but also to any benefit or favour, indirect or otherwise, such as, for example: gifts;

contributions to associations or sponsorships; business activities, jobs, professional or consultancy assignments; investment opportunities confidential market or product information; discounts or payment extensions; courtesy expenses for third parties such as hospitality, meals, transport, entertainment.

All Dulevo employees are guaranteed access to an internal reporting system (**whistleblowing**) that facilitates the collection of any type of report relating to the Company’s operations, guaranteeing the whistleblowers protection from any retaliation.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.


1.5 QUALITY POLICY

Dulevo, in reaffirming its conviction that market competition can be ensured only by guaranteeing quality, renews its commitment to satisfy the needs of its customers alongside their contractual requirements.

The Company, therefore, recognises that in order to fulfil commitments and achieve objectives, it is necessary to maintain an efficient programme of activities specifically developed for this purpose, namely the Quality Management System entrusted to the QHSE Manager.

Quality, understood as the ability to meet customer expectations, needs, and requirements, and to satisfy all mandatory requirements, must be a commitment of all Dulevo employees.

All employees must adhere to the system's procedures and related documentation without exception. All department managers are responsible for applying, within

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their respective areas of competence, the requirements of the System's procedures and related documents.

Compliance with mandatory requirements must be ensured through:

- ✓ Inspection of components during acceptance
- ✓ Innovation and improvement of operational processes
- ✓ Training and development of personnel skills
- ✓ Inspection of output and incoming product
- ✓ Ongoing monitoring of customer satisfaction through timely complaint analysis
- ✓ Operating in compliance with applicable legislative and regulatory provisions, anticipating current laws, where possible, and setting ever-higher goals in order to make continuous improvement in performance a reality
- ✓ Taking into account technological developments in its processes

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.


1.6 POLICY ON SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY

Dulevo is actively committed to pursuing the Sustainable Development Goals approved by the UN General Assembly in 2015. The Company promotes, through continuous investment in innovation and research, the development of a green economy, implements initiatives for environmental and social sustainability, and promotes energy transition and efficiency.

To ensure the achievement of its strategic objectives, Dulevo has implemented Quality, Environmental, and Health and Safety Management Systems, in accordance with the requirements of the international standards ISO 9001, ISO 14001 and ISO 45001. Furthermore, Dulevo has adopted an Organisational Management and Control Model pursuant to Legislative Decree 231/01, which is considered a fundamental tool for guaranteeing compliance with ethical principles and the proper operation of its services, while promoting the sustainable development of its multi-stakeholder system.

In developing and implementing this Policy, Dulevo takes its inspiration from the following ethical and regulatory references that guide its actions and strategic decisions:

- ✓ UN Sustainable Development Goals
- ✓ Principles of the Global Compact Network
- ✓ GRI Standards
- ✓ European sustainability reporting standards
- ✓ Company Code of Ethics
- ✓ Specific policies and guidelines of the Fayat Group

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- ✓ Company Regulatory System
- ✓ Social responsibility standards of reference

The explicit statement of the Policy facilitates:

- ✓ supporting the Company in the strategic decision-making process on sustainability, including risk management
- ✓ improving the management of ESG risks and impacts at Dulevo, defining objectives and operational methods
- ✓ guiding the company's non-financial reporting process
- ✓ broadening knowledge and awareness of policies and of expected results related to issues of material importance
- ✓ promoting a culture of corporate sustainability
- ✓ raising awareness among top management, business partners, suppliers, employees and external collaborators of the importance of respecting the principles of corporate social responsibility

Dulevo's commitment to ensuring a sustainable business integrated with corporate social responsibility materialises by:

- ✓ guaranteeing compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and mandatory requirements in general at local, national, EU and international level)
- ✓ adopting eco-design principles in projects
- ✓ refusing to resort to, or support the use of, child labour in line with applicable legislation, relevant ILO Conventions and the International Convention on the Rights of the Child
- ✓ refusing to resort to, or support the use of, forced or compulsory labour
- ✓ guaranteeing a safe and healthy working environment and adopting effective measures to prevent potential accidents, injuries or illnesses that may occur as a result of, in connection with, or during the course performance of work
- ✓ respecting the right of workers to join and form trade unions of their own choice and the right to collective bargaining, effectively informing staff that they may freely join any workers' organisation of their choice, without any negative consequences or retaliation from the organisation
- ✓ refusing to resort to or support any form of discrimination in hiring, remuneration, access to training, promotion, termination of employment or retirement, based on race or national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age, or any other condition that could give rise to discrimination

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- ✓ prohibiting the use of any form of physical, bodily and mental coercion, including verbal insults or any other offence against the dignity of persons
- ✓ complying with applicable laws on working hours, time off and holidays, guaranteeing a decent and adequate wage
- ✓ acting consistently to engage, motivate and develop the skills of all personnel through training, information and awareness-raising initiatives
- ✓ implementing a communication system for reporting incidents that violate legal or ethical standards, in accordance with Corporate Social Responsibility principles, in order to identify legitimate expectations and ensure their fulfilment
- ✓ developing and extending information, communication, education and training processes and promoting dialogue with stakeholders in order to ensure the efficient and effective implementation of the integrated corporate system
- ✓ engaging all suppliers of goods, services and activities and ensuring their commitment to corporate social responsibility aligned with all the requirements of the reference standard


Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.

1.7 POLICY ON SUSTAINABLE PROCUREMENT

In order to reduce environmental impact and promote ethical standards throughout the supply chain, Dulevo is beginning to implement responsible sourcing practices.

The sustainable procurement policy is based on the following fundamental principles and commitments:

- ✓ **Selection and evaluation of suppliers:** the company will prioritize suppliers who adhere to strict environmental standards and respect human rights and ethical labour practices. Suppliers will be regularly assessed based on ethical and social criteria
- ✓ **Waste reduction:** work with suppliers to minimise unnecessary packaging, promote recycled materials and encourage recycling
- ✓ **Promoting recycling:** requiring suppliers to increase the use of recycled materials in their delivered products
- ✓ **Energy efficiency:** requiring suppliers to adopt technologies and practices to reduce energy consumption and carbon footprint
- ✓ **Sustainable products:** prioritising the purchase of durable, eco-designed and environmentally friendly products

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- ✓ **Transparency:** communicating the origin of products and the environmental practices of suppliers
- ✓ **Environmental criteria in procurement decisions:** considering the environmental impact when selecting products and services
- ✓ **Awareness-raising and training:** educating staff on responsible procurement practices and training employees and suppliers on ethical standards and human rights
- ✓ **Innovation and research:** investing in research and development of innovative solutions to improve procurement practices
- ✓ **Regulatory Compliance:** complying with all applicable laws and regulations
- ✓ **Collaboration with Stakeholders:** promoting and sharing responsible best practices with suppliers
- ✓ **Monitoring and evaluation:** establishing mechanisms to measure the effectiveness of the responsible procurement policy
- ✓ **Respect for human rights:** not collaborating with suppliers tainted by human rights violations
- ✓ **Ethical labour practices:** ensuring safe and healthy working conditions and fair remuneration
- ✓ **Responsibility along the supply chain:** working with suppliers to ensure compliance with ethical and social responsibility requirements
- ✓ **Continuous monitoring:** assessing suppliers' compliance with ethical standards and taking corrective measures when necessary
- ✓ **Legal compliance:** adhering to laws and regulations relating to human rights and ethical labour practices

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.


1.8 POLICY ON DIVERSITY, INCLUSION AND GENDER EQUALITY

Every person at Dulevo is a unique and different individual, with their own personality, history, and skills.

Recognising this, the company values diversity among its employees, collaborators, suppliers, and stakeholders as a driving force for growth and success, valuing and optimising their experiences and abilities.

Dulevo is committed to pursuing this policy through the following key actions:

- ✓ Creating a workplace free from all forms of direct or indirect, group or individual discrimination, any kind of violence or harassment, whether physical, verbal and/or digital, whether sexual or based on personal, political and cultural diversity
- ✓ Conducting ethical and transparent recruitment practices aimed at recognising merit while respecting equal opportunities

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- ✓ Ensuring equal opportunities for all employees
- ✓ Promoting an inclusive culture and a zero-tolerance policy towards discrimination
- ✓ Implement awareness and training programmes on diversity and inclusion
- ✓ Providing an accessible and adapted working environment to support employees with disabilities
- ✓ Creating a working environment that protects the psycho-physical well-being of all employees, promoting and implementing programmes and measures to facilitate work-life balance and to support and value parenting and the sharing of care responsibilities
- ✓ Regularly evaluating progress in terms of diversity, equity and inclusion.

Dulevo will not tolerate any form of discrimination based on ethnicity, race, colour, gender, sexual orientation, religion, nationality, age, disability, political opinion, trade union membership, marital status, health status, or any other social status or personal characteristic.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.


1.9 ENERGY POLICY

Environmental protection is a priority for Dulevo, which aims at the **“efficient use of energy resources”**.

The company is committed to safeguarding the environment by continuously analysing aspects of material significance to help prevent possible adverse impacts and by using energy resources rationally and sustainably. This includes prioritising renewable energy sources and limiting the use of non-renewable resources.

Dulevo's commitment is demonstrated through:

- ✓ guaranteeing compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and requirements at local, national, EU and international levels)
- ✓ limiting and continuously decreasing the use of fossil fuel energy resources
- ✓ maximising the use of renewable energy sources
- ✓ ensuring the rational use of all energy sources
- ✓ mitigating negative impacts on surrounding communities
- ✓ containing and reducing global specific energy consumption in order to minimise greenhouse gas emissions

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- ✓ designing and realising works that minimise energy consumption during the construction, maintenance, and use phases
- ✓ implementing the most modern and suitable technical and organisational measures to contain energy use
- ✓ providing ongoing training to staff to increase environmental awareness and prevent accidents and potential negative impacts
- ✓ complying with all applicable energy-related legal requirements/legislation
- ✓ raising awareness among its partners on the rational use of energy.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.

1.10 INFORMATION SECURITY POLICY


All information created or used by Dulevo must be safeguarded and protected according to its classification, from its creation phase through to its use and erasure.

Information must be managed securely, accurately, and reliably, and must be readily available for authorised uses.

For the purposes of this policy, 'use of information' shall mean any form of processing that deploys electronic or paper-based media or that permits verbal communication in any form whatsoever.

In addition, Dulevo undertakes to:

- ✓ guarantee information confidentiality also by implementing robust security measures to deter unauthorised access, uncontrolled dissemination, or disclosure
- ✓ ensure data integrity, including through appropriate measures to prevent unauthorised modifications, including human error or damage to the physical format and/or semantic content of the information
- ✓ ensure availability of information also by implementing appropriate measures to guarantee access to information resources at times and in ways that accord with business needs
- ✓ systematically analyse and manage risks impacting on information security, in compliance with company policies and models, in order to identify necessary controls to be adopted, also in light of the constantly evolving external threat landscape (cybersecurity)

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- ✓ monitor at corporate level the security status of information and of IT systems and the level of compliance with internal regulations and legal constraints, as applicable
- ✓ ensure the continuous improvement of data processing measures taken to protect the personal data of customers and stakeholders in corporate management and in the provision of IT services
- ✓ prevent and manage information security events and/or incidents and/or personal data breaches, collecting and preserving relevant records, including for the purposes of judicial proceedings and improvement programmes
- ✓ promote and implement targeted or broad-based training and education initiatives on information security.

Quantified, measurable and consistent objectives (see Annex 1) will be defined, disseminated and verified annually in the Management Review.

2. ANNEXES

Annex 1 QHSE-MOD-DIR-5.2.1-01 "*Integrated Corporate Policy Objectives*"