



COMPANY'S INTEGRATED POLICY

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1 Company's policy

Impresa Pizzarotti & C. S.p.A. (from now on "Company") is committed to operate according to the principles of **sustainable development** in order to offer its Clients services and products with high added value that contribute, in compliance with applicable laws, to economic progress, to the improvement of social well-being and to the protection of the environment of the Countries in which it operates.

The **Board of Directors** and **Top Management** of the Company are aware that only thanks to the commitment of all those who work in the company and for the Company is possible to:

- ◆ execute complex works supporting, sharing, and applying in their sphere of influence the fundamental principles of the United Nations Global Compact regarding **human rights, labour standards, environmental protection**, and the **fight against corruption**;
- ◆ create products and works, using the best construction methods and technologies that guarantee, within the time limits established by the contracts, a high-quality result that also entails a consequent limitation of operating costs;
- ◆ protect the **Workers' Health and Safety**, ensuring health surveillance in agreement with the competent physician and analyzing in detail the production activities to identify risks and prevent events;
- ◆ to encourage the **consultation** and **participation of the workers** and, where established, of workers' representatives, on matters related to Health and Safety;
- ◆ safeguard the **environment**, analyzing the significant aspects to prevent possible impacts and using raw materials in a rational and sustainable way, favoring, where possible, recovery and/or recycling, encouraging the development and use of innovative technologies both in the design phases and in the construction phases of the works;
- ◆ guarantee the dignity of every worker and offer equal opportunities without any **gender distinction** respecting diversities of any kind.

This document constitutes a **formal declaration** with which the Owners and the **Top Management** intend to set out the corporate strategic guidelines and the principles on the basis of which the Organisation must develop the Company Management System, in order to pursue an ethical, sustainable, and respecting the interested parties involved in the production processes.

This Integrated Policy (hereinafter the "Policy") is structured according to the following main themes:

- ◆ Quality Policy;
- ◆ Environmental Policy;
- ◆ Occupational Health and Safety Policy;
- ◆ Sustainability Policy;
- ◆ Sustainable Procurement Policy;
- ◆ Human Resources Management Policy;
- ◆ **Diversity and Inclusion Policy;**



- ◆ Road safety;
- ◆ Energy;
- ◆ Social responsibility;
- ◆ BIM;
- ◆ Anti-Corruption Policy.

The contents of this Policy:

- ◆ apply to all operations carried out by the Company both in Italy and abroad;
- ◆ are approved by the Presidency of the Board of Directors;
- ◆ are disclosed to the entire company organisation, to all collaborators and other interested parties through information system distribution and publication on the company website.

The Top Management:

- ◆ Are committed to periodically review, on a minimum annual basis, the Policy to ensure its adequacy with the strategic and behavioral guidelines set, giving it adequate visibility to the entire Organisation and to the interested parties;
- ◆ consider as their responsibility to call all personnel of all levels and degrees, within the scope of their respective competences and responsibilities, operating in Italy and anywhere in the world, to full compliance with this Policy, with the Code of Ethics and what is defined in the Company's Management System.

Impresa Pizzarotti formally requests its business partners and suppliers to align themselves with the principles expressed in this Policy.

1.1 Quality Policy

The Impresa Pizzarotti mission is to provide complex works, excellent services, and products through sustainable and innovative processes, using the best construction methods and technologies that guarantee, within the time limits set by the contracts, a high-quality result.

Impresa Pizzarotti has adopted an adequate and effective Quality Management System, aimed at the continuous improvement of performance and sustainability through careful risk management in the construction processes of the works and the provision of services.

Compliance with mandatory requirements must be guaranteed by:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and mandatory prescriptions in general at a local, national, European, and international level);
- ◆ the implementation of an effective and efficient Quality Management System;
- ◆ the extended approach to "Risk Management" in order to anticipate and minimise the effects of technical and economic-financial risks and to enhance the opportunities for improving competitiveness;



- ◆ the continuous search for the satisfaction of the Client's expectations and all interested parties;
- ◆ the extended and continuous control of the entire production process through accurate and detailed planning and the implementation of the best quality assurance and verification techniques;
- ◆ research and development of innovative technologies to optimise the quality of products and processes;
- ◆ the use of adequate and qualified resources to develop, maintain and disseminate the culture of quality in the company organisation.

1.2 Environmental Policy

Environmental protection is a priority for Impresa Pizzarotti & C. S.p.A. which pursues the objectives of "**zero environmental incidents**" and "**zero pollution**".

The mission of Impresa Pizzarotti is to safeguard the environment, through the continuous analysis of the significant aspects to prevent possible impacts and using raw materials in a rational and sustainable way, favoring, where possible, recovery and/or recycling, encouraging the development and use of innovative technologies both in the design phases and in the construction phases of the works.

Impresa Pizzarotti has adopted an Environmental Management System which is a guide for the continuous improvement of environmental performance and the development of sustainability.

The environmental commitment of Impresa Pizzarotti & C. S.p.A. manifests itself through:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and mandatory prescriptions in general at a local, national, European, and international level);
- ◆ the availability of adequate resources to guarantee the effective implementation of the Environmental Management System;
- ◆ the prevention of local pollution, working on the direct and indirect impacts that can be controlled and / or influenced by the typical operations of its production processes and applying an extended approach to "Risk Management";
- ◆ the mitigation of negative impacts on surrounding communities;
- ◆ the containment and constant reduction of the consumption of water resources and raw materials;
- ◆ the containment and reduction of waste production through recovery and recycling processes;
- ◆ the containment and reduction of energy consumption in order to minimise greenhouse gas emissions;
- ◆ the creation of works whose use is not dangerous for the health and safety of end users and all interested parties;
- ◆ the creation of works that have the highest possible rate of recyclability at the end of their life;
- ◆ the application of the most modern and appropriate technical and organisational measures to protect and preserve ecosystems and biodiversity;
- ◆ the management and reduction of hazardous chemicals;



- ◆ continuous training of personnel in order to increase environmental awareness and consequently prevent accidents and potential negative impacts.

1.3 Occupational Health and Safety Policy

The health and safety of workers are fundamental for Impresa Pizzarotti which pursues the **objectives** of "**damage zero** " and "**zero incidents**".

Impresa Pizzarotti has adopted a rigorous, adequate, and effective Health and Safety Management System aimed at constantly improving performance and seeking sustainability through the implementation of an extended approach to "Risk Management".

The commitment of the Company to guarantee the health and safety of all personnel is manifested through:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and mandatory prescriptions in general at a local, national, European, and international level);
- ◆ the promotion of a culture of safety, placing preventive measures before protective measures;
- ◆ the creation and maintenance of healthy and safe working conditions in the context of a work environment characterised by the maximum technologically feasible safety, meaning the maximum technical, organisational, and procedural safety;
- ◆ the guarantee of constant and punctual health surveillance in agreement with the competent physician;
- ◆ the contrast with all available means, albeit in compliance with the laws and mandatory regulations, of any behavioral excess, with particular attention to smoking and the use of narcotic and alcoholic substances, in the workplace or while carrying out responsibilities and activities of personnel;
- ◆ detailed analysis of production activities to identify risks and prevent events;
- ◆ the implementation of all measures capable of minimizing the probability of accidents, injuries, and occupational diseases;
- ◆ the use of innovative technologies and production processes, adequate and qualified resources;
- ◆ the involvement and consultation of workers and, where established, of Workers' Representatives, on matters relating to Health and Safety, making them active participants;
- ◆ continuous training of workers and the implementation of a constantly updated information, instructions, and supervision system to integrate a positive health and safety culture;

Impresa Pizzarotti guarantees and encourages consultation and participation of the Workers and, where established, of the Workers' Representatives, on matters relating to Health and Safety;

1.4 Sustainability Policy

The mission of the Company is to build excellence in a sustainable and innovative way.



Conducting its industrial activity, the Company acts in full respect of human rights, in accordance with the principles:

- ◆ of the UN Universal Declaration of Human Rights;
- ◆ of the United Nations Global Compact;
- ◆ of the Charter of Fundamental Rights of the European Union;
- ◆ as well as in compliance with any specific legislation in force in the countries in which it operates.

The Company works with its Clients, partners, and suppliers to create works/products with the requisites suitable for creating social and economic value for the communities in which it operates.

The commitment to this goal is made in the most responsible way possible towards the environment and society and is manifested through:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and mandatory prescriptions in general at a local, national, European, and international level);
- ◆ full respect for the human rights of all employees and other parties involved in the operations;
- ◆ maximum interaction with all stakeholders and proactive listening to the legitimate expectations of local communities so that the works created leave a positive legacy following their completion;
- ◆ the utmost effort to ensure health, well-being, and safety at the highest standards in all workplaces and to promote the culture of "damage zero", as indicated in the Health and Safety policy;
- ◆ the continuous evaluation and promotion of equality and inclusion in the workforce;
- ◆ "zero" tolerance towards discrimination or inappropriate behavior;
- ◆ the constant search for the development of personnel skills;
- ◆ the adoption of *eco-design* principles in projects.

1.5 Sustainable Procurement Policy

The mission of the Company is to build excellence through a sustainable and ethical supply chain.

The commitment of Impresa Pizzarotti to provide sustainable results, through the works and products it produces, extends beyond the boundaries of operations aimed at the supply of materials, works or services provided by third parties.

The Company, in fact, respects the Human Rights of Employees and Local Communities and is committed to promoting these principles with its Suppliers/ Subcontractors identifying and managing environmental impacts, ethical, social and economic within the supply chain and by committing to purchasing sustainable, ethical and responsible materials, goods and services, in accordance with ISO 20400.

To this end, in collaboration with designers and supply chain partners, the Company undertakes to:

- ◆ to avoid a negative social, ethical and environmental impact in the supply chain;
- ◆ reduce the environmental impact of operating activities by purchasing products that meet recognised environmental standards.



The sustainable procurement practices in which the Pizzarotti S.p.A. Company is engaged at all levels of its organization are:

- ◆ ethical sourcing through the formal request for acceptance and signature by suppliers of ethical and anti-corruption principles;
- ◆ the efficiency of resources, the minimisation of waste and the preferential use of materials, products and services that favor the benefits of the circular economy;
- ◆ collaboration with suppliers who actively manage their impact on habitats and the environment in order to promote the conservation of biodiversity and environmental protection;
- ◆ the application, where possible, of innovative *eco-design* principles to projects with the aim of minimizing the impacts associated with the procurement of materials and energy;
- ◆ purchase, where possible, of goods and use of services in line with international principles aimed at promoting and protecting Human Rights recognised by the principles of the United Nations Global Compact (defined by the Universal Declaration of Human Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work for Anyone Engaged in the Corporate Supply Chain;
- ◆ inclusion of sustainability criteria as part of the evaluation process of suppliers and subcontractors;
- ◆ implementation of environmental and safety legislation, including international obligations on climate change and sustainable development such as reducing CO2 emissions and protecting biodiversity;
- ◆ prioritise, where possible, Suppliers/Subcontractors who have incorporated ethical and sustainable practices within their organisation and pursue them within their supply chain;
- ◆ promoting a level of sustainability awareness among supply chain partners and encouraging them to adopt sustainable practices;
- ◆ purchase, where possible, goods and services that reflect appropriate and recognised environmental specifications or standards in order to pursue the continuous improvement of internal procurement practices;
- ◆ purchase, where possible, only products from sustainable sources;
- ◆ to promote the replacement of products potentially harmful to the environment when a less harmful alternative is available;
- ◆ to avoid the use of products potentially harmful to the environment when a less harmful alternative is available;
- ◆ use, where possible, products that have a minimal impact on the environment, both local and global. The factors taken into account will include the sustainability of production, transport, the energy used, the consumption of raw materials, the production of waste and the percentage of recycled content or a high recyclability factor;
- ◆ to reduce, where possible, the impact of deliveries and to facilitate the supply of materials, products and services from local markets;
- ◆ where possible, consume and buy less by identifying and eliminating wasteful practices in internal and external operations over which the Company has influence.



In particular, Suppliers/Subcontractors are required to include the Sustainability criteria as part of the procurement process, and in general:

- ◆ prefer purchases of RoHS compliant Electrical and Electronic Equipment in order to limit the presence in the final products of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers;
- ◆ require compliance with the REACH regulation for purchased chemicals with a consequent reduction in the use of environmentally harmful substances;
- ◆ prefer recyclable packaging, wood and FSC certified paper, guaranteeing the origin of the product from a forest and a supply chain managed in a responsible way;
- ◆ prefer cellulose fibers certified FSC;
- ◆ favour the purchase of steel materials from suppliers that produce by implementing measures for the health and safety of workers, energy efficiency and the reduction of environmental pollution;
- ◆ provide in Supply/Subcontracting contracts for compliance with legal requirements in terms of ethics, integrity and anti-corruption;
- ◆ to reduce the impact of distribution by encouraging the supply of materials, products and services from local businesses;
- ◆ promote the reuse and recycling of materials and products at the end of their life cycle and, where this is not possible, ensure disposal in the most appropriate manner;
- ◆ preferring suppliers/subcontractors who implement sustainable development practices by requiring, within the selection process, actions aimed at a social commitment also through voluntary certifications (e.g. SA8000, ISO 14001, EMAS, ISO 45001, ISO 37001, ISO 30415, ISO 20400, etc.) and participation in sustainable development programmes (e.g. Global Compact).

1.6 Human Resources Management Policy

The Company considers, also in relation to its type of *business*, Human Resources as the main value, the main competitive and development factor of its business.

Top Management provides and promotes active leadership that fosters trust, openness, and collaboration in order to facilitate and support a healthy and inclusive working environment and a correct enhancement of personnel based on principles of transparency and meritocracy.

The commitment of Impresa Pizzarotti is aimed at attracting, retaining, and promoting talented human resources through:

- ◆ guaranteeing the best working conditions for all employees, granting rates and working hours in line with the relevant national collective agreements and providing specific social assistance;
- ◆ adequate training and development plans (*career management*) in order to offer its employees the best development tools necessary to realise their potential;
- ◆ creation and development of technical skills, based on company trends and values;
- ◆ maintaining a constant and respectful dialogue with employee representatives and social partners in order to ensure a favorable working environment based on collaboration and communication;
- ◆ the assurance of fair and adequate remuneration;



- ◆ the promotion of health, safety, and well-being in the workplace, according to its own health and safety policy;
- ◆ "zero" tolerance towards any kind of discrimination regarding age, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or personal beliefs or sexual orientation.

Impresa Pizzarotti & C. S.p.A., by company choice, formally declares that it never, in any way and in no case, recurses to child labour.

The Company hires only and exclusively staff of age and firmly opposes forced labour and any form of work contrary to:

- ◆ human rights;
- ◆ current legislation;
- ◆ the agreements signed with the social partners.

The Company offers its human capital equal opportunities and is committed to supporting a healthy culture of collaboration in which people can freely express their opinions in the context of corporate values.

The Company encourages its employees to directly and informally address any behavioral or relational problem through discussion and conciliation. However, he reiterates that in no case are inappropriate behaviors in the workplace tolerated such as for example:

- ◆ discrimination and harassment of an individual on grounds of age, disability, ethnicity, gender, religion, political beliefs, sexual orientation, marriage and civil union, pregnancy, and motherhood;
- ◆ insults, comments, social isolation, physical acts, defamation, intimidation, or emotional manipulation;
- ◆ bullying that is likely to defame, offend, belittle, degrade, intimidate, or deliberately humiliate a person;
- ◆ unequal treatment;
- ◆ Harassment or conduct that creates a hostile or intimidating environment, adversely affects a person's participation or commitment;

To all employees of Impresa Pizzarotti is guaranteed access to an internal complaints system (*whistleblowing*) which allows them to report any type of discrimination or inappropriate behavior in the workplace, guaranteeing the reporting subjects the protection from any retaliatory action.

1.7 Policy for Diversity and Inclusion

Each person represents for the Company a unique and different individual, with his own personality, history and skills.

For this reason, the Company recognizes the diversity of its employees, collaborators, suppliers and interlocutors in general, as a factor of growth and success, valuing their experience, skills and quality.

The Company believes that diversity, in all its manifestations, is a strategic advantage, bearer of enrichment



and cultural openness; for this it promotes an inclusive working environment, aimed at collaboration and growth with the support of all, this has been achieved by encouraging each person to express themselves freely, thereby freeing the potential of each and increasing their motivation.

Corporate growth is considered synergistic to the professional and personal growth of each employee.

The Diversity and Inclusion Policy, in line with the Code of Ethics, applies to all employees, contractors, suppliers, customers and all stakeholders in general.

The Company's Integrated Management System is designed, implemented and updated to meet the requirements of ISO 30415:2021:

- ◆ **Recognizing diversity:** valuing all people intrinsically, individually and as groups, appreciate how the different dimensions of diversity intersect and recognize that demographic features and other personal characteristics can be protected by laws and regulations.
- ◆ **Govern effectively:** exemplify and promote top management's commitment to D&I through the use of inclusive systems, policies, processes, practices and organizational governance operations.
- ◆ **Acting responsibly:** acting ethically and socially responsible, promoting productive employment and decent work for all.
- ◆ **Working in an inclusive way:** enabling and developing an accessible and respectful working environment that fosters inclusion and a sense of belonging.
- ◆ **Communicating in an inclusive way:** recognizing and responding to the needs of people entering the organization, understanding and relating to communications in different ways.
- ◆ **Supporting and disseminating D&I:** actively influencing and promoting inclusive organization practices and relationships with stakeholders.

In Impresa Pizzarotti will never be tolerated any form of discrimination on the basis of ethnicity, race, skin color, gender, sexual orientation, religion, nationality, age, disability, political opinion, union affiliation, marital status, health status and any other social status or personal trait.

Therefore, the Company undertakes to:

- ◆ To create a work environment free from any direct or indirect discrimination, associative or individual, any type of violence or harassment, whether sexual or based on personal, political and cultural diversity;
- ◆ Promote an inclusive and respectful culture, involving all people and providing opportunities to develop their potential;
- ◆ To pursue a policy of selection of staff with a view to the recognition of merit, while respecting equal opportunities. This policy is based on a transparent assessment of competences and capabilities. Any career opportunity or professional advancement will be managed without any kind of discrimination and with respect for diversity;
- ◆ Ensure the training and promotion of people, improving the professional development of their resources, inspiring all employees to reach their full potential and supporting the sharing of best practices across the organization;
- ◆ To pursue the goal of ensuring that all employees and collaborators treat others at all times with



dignity, respect and equity, showing a conduct that reflects inclusion and upholds the values of the Company.

1.8 Road Safety Policy

The protection of road users is a priority for Impresa Pizzarotti & C. S.p.A., which pursues the **objectives of "zero accidents"**.

The Impresa Pizzarotti's mission is to safeguard users intended as its staff who use company's and their own vehicles and as external users who use the road infrastructures built and/or maintained by the company.

The Impresa Pizzarotti has adopted a Road Safety Management System aimed at constantly improving performance to limit road accidents.

The commitment of Impresa Pizzarotti & C. S.p.A. manifests itself through:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and provisions that are generally mandatory at a local, national, European, and international level);
- ◆ the availability of adequate resources to guarantee the effective implementation of the Road Safety Management System;
- ◆ the prevention of road accidents by keeping under control means of transportations, vehicles, infrastructures, and human resources with an approach extended to "Risk Management";
- ◆ the mitigation of negative impacts on users;
- ◆ the containment and reduction of its staff's accidents;
- ◆ the containment and reduction of accidents and their severity for road users;
- ◆ the creation of works with the least possible accident rate;
- ◆ the application of the most modern and appropriate technical and organisational measures to prevent road accidents;
- ◆ the continuous training of staff in order to increase road safety awareness;
- ◆ the compliance with legal provisions on road traffic safety;
- ◆ the awareness-raising of its partners on road safety.

1.9 Energy Policy

Environmental protection is a priority for Impresa Pizzarotti & C. S.p.A., which pursues the objective of a **"rational use of energy sources"**.

The mission of Impresa Pizzarotti is to safeguard the Environment, through the continuous analysis of the significant aspects to prevent possible impacts and the use of energy resources in a rational and sustainable way, favoring, where possible, renewable resources and limiting non-renewable resources.

The Impresa Pizzarotti has adopted an Energy Management System aimed at constantly improving environmental, in terms of energy and development of sustainability.



The commitment of Impresa Pizzarotti & C. S.p.A. manifests itself through:

- ◆ the guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives, and provisions that are generally mandatory at a local, national, European, and international level);
- ◆ the availability of adequate resources to guarantee the effective implementation of the Energy Management System;
- ◆ the continuous limitation and reduction of the use of fossil energy resources;
- ◆ the maximisation of the use of renewable resources;
- ◆ the rational use of any energy sources;
- ◆ the mitigation of negative impacts on surrounding communities;
- ◆ the containment and reduction of the specific global consumption (SGC) of energy to minimise greenhouse gas emissions;
- ◆ the design and creation of works that have the lowest rate of energy use both in the creative phases and in the maintenance and use phases;
- ◆ the application of the most modern and appropriate technical and organisational measures to limit the energy use;
- ◆ the continuous training of staff in order to increase environmental awareness and consequently prevent accidents and potential negative impacts;
- ◆ the compliance with the current legal provisions on energy;
- ◆ the awareness-raising of its partners on the rational use of energy.

1.10 Social Responsibility Policy

The Impresa Pizzarotti & C. S.p.A. also undertakes to strengthen its social commitment through a proper and transparent management of its "human heritage" and the awareness-raising of the Board of Directors, suppliers, employees, and external collaborators, to comply with Social Responsibility principles established in the SA8000 (Social Accountability) Standard. This is done by:

- ◆ not resorting to or supporting the use of child labour in line with the provisions of current legislation, the relevant ILO Conventions, and the International Convention on the Rights of the Child;
- ◆ not resorting to or supporting the use of forced or compulsory labour;
- ◆ ensuring a safe and healthy work environment and taking effective measures to prevent potential accidents, injuries or illnesses that may occur as a result of, in connection with, or during work;
- ◆ respecting the right of workers to join and form trade unions of their choice and the right to collective bargaining, effectively informing staff that they can freely join any workers' organisation of their choice, without this having any negative consequences or provoking retaliation by the organisation;
- ◆ not resorting to or supporting any form of discrimination in hiring, pay, access to training, promotion, termination of employment or retirement, based on race, 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 conditions that could result in discrimination;



- ◆ prohibiting the use of any form of physical, corporal, and mental coercion, including verbal offences or any further offence against the dignity of people;
- ◆ complying with the current laws regarding working hours, rest, and holidays, guaranteeing a decent and sufficient wage;
- ◆ acting constantly for the involvement, motivation, and development of the professionalism of all staff, through training, information, awareness-raising interventions;
- ◆ activating a Communication System for the management of reports relating to the application of the SA8000 standard, in order to detect legitimate expectations and ensure their fulfilment;
- ◆ developing and extending information, communication, education and training processes and promoting dialogue with interested parties, to ensure efficient and effective application of the integrated company system;
- ◆ involving all suppliers of goods, activities and services and their commitment to social responsibility by complying with all the requirements of the reference standard.

1.11 Building Information Modeling's Management Policy

Given the importance of equipping itself with innovative tools and processes in the building sector, Impresa Pizzarotti & C. S.p.A. has decided to introduce the Building Information Modeling for the design and assistance to Orders. The BIM allows greater control over the project management process by anticipating problems and risks before they occur on site. The BIM is also required by many clients both nationally and internationally, in addition the BIM Decree (Italian Ministerial Decree 560/2017) establishes that it is mandatory for Public Works with a value of more than 15 million euros with effect from 1 January 2021.

Undertaking to maintain a high quality standard, Impresa Pizzarotti & C. S.p.A. has equipped itself with a BIM Management System based on Reference Practice 74/2019 which defines the requirements of a BIM Management System (BIMMS), intended as a digitised management system of an organisation supported by information management, which an organisation must implement to improve the efficiency of the digitised process of programming, design, production, operation and maintenance, and possible disposal of the immovable asset.

In this context, the Top Management undertakes to:

- ◆ maintain and promote an effective BIM Management System integrated with the ISO 9001 management system;
- ◆ ensure the integration of the BIM management system requirements into the organisation's business processes;
- ◆ define and periodically review the Policy, objectives, and programs for the BIM in order to assess their adequacy to continuously improve performance of the BIM Management System;
- ◆ ensure the availability of the resources necessary for the BIM Management System;
- ◆ train and continuously update the reference functions involved in the BIM process;
- ◆ maintain an information exchange system (Common Data Environment, CDE) with external stakeholders based on the criteria of the UNI11337 standard;
- ◆ create and manage files and name them also according to the interoperability on open schemes;



- ◆ communicate and make available the BIM Policy, so that it is understood and applied within the organisation, expressing the commitments established also through the so-called "BIM Guidelines".

1.12 Anti-Corruption Policy

The Anti-Corruption Policy below was approved by the Board of Directors with meeting minutes of 7 March 2022.

The Company adopts a firm and absolutely forbidden approach to any form of corruption and market distortion.

Impresa Pizzarotti formally expresses the absolute obligation to strictly comply with all laws, rules, and regulations in the field of fighting corruption and extortion in Italy and in all the countries in which the company operates.

The Company undertakes to conduct its commercial activities and its business in such a way as to never be involved in any corruption case in order to avoid any involvement in illegal situations, both in relations with public entities and with private entities.

The Company is firmly committed to develop its business according to ethical principles and fair competition within the market in which it operates, counteracting any distortion of the same, such as by way of example and not limited to:

- ◆ commercial fraud;
- ◆ money laundering;
- ◆ social dumping;
- ◆ conflict of interest.

In particular, it is absolutely forbidden to all employees or collaborators:

- ◆ offer, promise, give, pay, or authorise someone to give or pay, directly or indirectly, money or other economic advantage, utility, or benefit of any kind for illegal purposes;
- ◆ accept the request or authorise someone to accept or solicit, directly or indirectly, a payment or an economic advantage or other benefit from public or private entities;
- ◆ receive or obtain the promise of money or other benefits, for oneself or for others, to carry out or omit acts in violation of the obligations inherent in their office or the obligations of loyalty.

All the limitations described concern not only cash payments but also any utility, even indirect, such as, by way of example: gifts; contributions to associations or sponsorships; commercial activities, jobs, professional or consulting assignments; investment opportunities; confidential information relating to the market or products; discounts or deferred payments; courtesy expenses to third parties such as hospitality, meals, transport, entertainment.



To all employees of Impresa Pizzarotti is guaranteed access to an internal complaints system (*whistleblowing*) that allows them to collect any type of report relating to company operations, guaranteeing the reporting subjects the protection from any retaliatory action.

Furthermore, Impresa Pizzarotti & C. S.p.A.:

- ◆ defines the measures suitable to pursue the principles set out above;
- ◆ declares the authority of the Anti-Bribery Compliance Manager;
- ◆ implements all the procedures necessary to verify compliance with this Policy, the Code of Ethics, and the applicable Anti-Corruption Laws;
- ◆ subjects the contents of its Anti-Corruption Management System to continuous review and monitoring in line with the requirements of the UNI ISO 37001: 2016 standard and
- ◆ undertakes to continuously improve the Anti-Corruption Management System.

The application of this Policy is the responsibility of all employees of Impresa Pizzarotti & C. S.p.A. and of all those who establish relationships with the Company itself.

Each department manager is responsible for supervising if their collaborators comply with the Anti-Corruption Management System.

Violation of the Policy by Impresa Pizzarotti's employees will result in the adoption of disciplinary measures. The Impresa Pizzarotti will also ensure its full cooperation with the competent Authorities. Any violation will be prosecuted with the application of adequate and proportionate disciplinary sanctions, also taking into account the possible criminal relevance of the conduct.

The violation by third parties of the principles or provisions of the Policy may result, based on specific assessments of the Company, in the failure to establish or termination of contractual relationships.