COMPANY POLICY

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Rev.	Data	Descrizione
A	19/07/2017	Emission
O	04/08/2026	Integration with Stakeholder Engagement Policy, Personal Data Protection Policy, Responsible Use of Artificial Intelligence Policy. Update of environmental, social, and supply chain commitments.

Changes in a new revision result in orange color (RGB red=196; green=89; blue=17)

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1 Company 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, labor 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;
- Protecting **Information Security**, ensuring measures and actions aimed at protecting the confidentiality, integrity and availability of the same;
- protect and ensure the safety and well-being of employees **traveling** on behalf of the Company through effective and proactive management of **risks** associated with travel;
- promote a structured, continuous, and transparent dialogue with its **stakeholders**, recognizing their involvement as an essential element for defining sustainability strategies and for the double materiality analysis.
- protect the **personal data** of employees, clients, suppliers, and stakeholders, preventing improper use, loss, alteration, and unauthorized access, safeguarding the rights, freedoms, and trust of individuals;
- adopt Artificial Intelligence as a **responsible** support tool for business processes, according to a risk-based approach, regulatory compliance, information security, protection of personal data and fundamental rights, ensuring adequate human oversight and using it as a lever for the continuous improvement of the Integrated Management System and company performance.

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 Organization 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;
- Information Security Policy;
- Travel Risk Management Policy;
- Stakeholder Engagement Policy;
- Personal Data Security and Protection Policy;
- Policy for the Responsible Use of Artificial Intelligence.

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 organization, 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 Organization 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.

This document is prepared by the QHSSE & ESG Area based on contributions from the competent Functions, verified by the QHSSE & ESG Director, and approved by the Chief Executive Officer. The Policy is updated whenever there are significant changes in the regulatory, strategic, organizational, or operational context of the Company.

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 minimize 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 optimize 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 organization.

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 minimize 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 organizational 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;
- the reduction of greenhouse gas emissions generated by production processes, expressed in CO_2 equivalent, pursuing by 2030 a reduction of at least 5% compared to the 2024 baseline, according to the organizational scope, calculation methodologies, and indicators defined in the company's sustainability programs;
- the reduction of the quantity of hazardous waste generated by production processes, pursuing by 2030 a reduction of at least 5% compared to the 2024 baseline, according to the scope and indicators defined in the company's environmental programs and taking into account the trend and type of production activities;
- the prevention of negative impacts of the works and products produced on the health and safety of customers, users, and other interested parties, ensuring the prompt assessment and management of any complaints, reports, or events attributable to the Company's activities.

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 characterized by the maximum technologically feasible safety, meaning the maximum technical, organizational, 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.

The above-mentioned principles and commitments extend, where applicable, to the protection of clients, visitors, and other individuals present in the Company's workplaces, as well as to the safety of the products and works carried out. The Company pursues the ongoing objective of preventing accidents and harm by adopting measures proportionate to the risks and ensuring the assessment and management of any events, complaints, or reports, systematically monitoring safety indicators (such as the frequency and severity rate of accidents) and pursuing a measurable objective of continuous improvement, with a progressive reduction of recordable events and the elimination of serious accidents.

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;
- obligations, regulations, directives, and mandatory provisions in general at the local, national, European, and international levels);
- the full respect of the human rights of all employees and other parties affected by the operations;
- respecting and safeguarding the rights of local communities affected by the Company's activities, with

particular reference to access to land and water resources, preventing and mitigating negative impacts, and ensuring the prompt assessment and management of 100% of complaints or reports received within the timeframes defined by internal procedures;

- 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 recognized environmental standards.

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

- the qualification and monitoring of suppliers and subcontractors through criteria proportionate to the nature and risk of the supply, including, where applicable, labor practices, respect for human rights, health and safety, environmental protection, ethics, and integrity;
- ethical sourcing through the formal request for acceptance and signature by suppliers of ethical and anti-corruption principles;
- the efficiency of resources, the minimization 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 recognized by the principles of the United Nations Global

Compact (defined by the Universal Declaration of Human Rights) and the International Labor 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;
- prioritize, where possible, Suppliers/Subcontractors who have incorporated ethical and sustainable practices within their organization 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 recognized 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;
- favor 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 programs (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 realize 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, recourses to child labour.

The Company hires only and exclusively staff of age and firmly opposes forced labor 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 and Gender equality

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 and UNI/PdR 125:2022 for Gender Equality:

- **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, including those of a gender, 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 and the promotion of equal opportunities;
- **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 and equal representation by gender at all levels;
- **Communicating in an inclusive way, responsible and respectful of all forms of diversity**: recognizing and responding to the needs of people entering the organization, understanding and relating to communications in different ways, use a neutral and attentive language, avoiding any form of prejudice and stereotypes, including gender.
- **Supporting and disseminating D&I**: actively influencing and promoting inclusive organization practices

and relationships with stakeholders, to communicate with them on these issues, recalling the principle of responsibility and its commitment to equal opportunities, respect and enhancement of diversity.

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, physical, verbal and/or digital, 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, according to principles, practices, procedures and policies aimed at promoting female empowerment and all forms of diversity;
- 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 and with procedures aimed at preventing and combating all forms of prejudice, including gender. Any career opportunity or professional advancement will be managed without any kind of discrimination and with respect for diversity;
- Ensure that human resource management processes promote equal opportunities in professional development, with a view to achieving equal representation of diversity at all levels and gender balance in leadership positions;
- 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, and ensuring that internal mobility and the succession to managerial positions are consistent with the principles of an inclusive organisation capable of enhancing equal opportunities;
- 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.
- Create a working environment that protects the psycho-physical well-being of all employees, promoting and implementing programs and measures aimed at promoting both the reconciliation of life and work that support and enhance the parenting and distribution of care loads
- Promote equal opportunities even outside its own organizational context, ensuring, among other things, the equal representation of genders among the panel speakers of any type of event (round tables, conferences, etc.).

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 organizational 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 maximization 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 minimize 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 organizational 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 labor 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 labor;
- 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' organization of their choice, without this having any negative consequences or provoking retaliation by the organization;
- 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

Recognizing the importance of adopting innovative tools and processes in the construction industry, Impresa Pizzarotti & C. S.p.A. has introduced Building Information Modeling (BIM) to optimize the design and management of construction contracts.

BIM, which is increasingly in demand by national and international clients, is regulated in Italy by the BIM Decree (Ministerial Decree 560/2017 and subsequent amendments Ministerial Decree 312/2021) and the Public Contracts Code (Legislative Decree 36/2023), which establish its progressive compulsoriness for public works, based on specific value and timing criteria.

To ensure high quality standards, Impresa Pizzarotti & C. S.p.A. has adopted and integrated a BIM Management System (SGBIM) compliant with PdR 74/2019. This system, based on digitized information management, is designed to improve efficiency in the processes of planning, design, construction, operation, maintenance and, if necessary, decommissioning of real estate assets.

In this context, the Top Management undertakes to:

- ensure that the Policy is appropriate to the purpose and context of the organisation and supports its strategic direction;
- ensure that the Policy provides a framework for setting targets;
- ensure that the Policy includes a commitment to meet applicable requirements;
- ensure the continuous improvement of the BIM Management System;
- 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;
- ensure create and manage files and name them also according to the interoperability on open schemes;
- the interaction between all phases strategy (feasibility), design, production (construction site), operation (management, maintenance, recovery, disposal);
- to promote, along the supply chain, the development of activities in BIM for an integrated and shared process;
- communicate and make available the BIM Policy, so that it is understood and applied within the organization, 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 pursues the objective of preventing and combating all forms of corruption and abuse of entrusted power for private gain, as well as related phenomena such as conflicts of interest, fraud, and money laundering, promoting the timely emergence of suspicious conduct and ensuring the proper reporting, assessment, and management of any violations, with the measurable goal of ensuring the handling and management of 100% of reports received within the timeframes defined by internal procedures.

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 authorize 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 authorize 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.

1.13 Information Security Policy

All information that is created or used by Impresa Pizzarotti is to be safeguarded and must be protected, according to the classification assigned, from their creation to their use and elimination. The information shall be handled in a secure, accurate and reliable manner and shall be readily available for permitted uses.

It is here to be understood as "use of information" any form of processing that uses electronic or paper media or allows, in any form, verbal communication.

In addition, Impresa Pizzarotti is committed to:

- ensure the confidentiality of information, including through appropriate measures to counter unauthorised access to information or uncontrolled dissemination or disclosure thereof;
- ensuring the integrity of the information, including through appropriate action to counter the occurrence of unauthorised changes, including human errors or damage to the physical format and/or semantic content of the information;
- ensure availability of information also through appropriate interventions to ensure access to information resources with times and methods "appropriate" to the needs of business activities;
- systematically carry out analysis and risk management activities impacting on information security, in accordance with policies and business models, to identify the necessary controls to be adopted also with reference to the continuous evolution of the external threat framework (cybersecurity);
- monitor at company level the state of information security and ICT systems and the level of compliance with the internal regulatory framework and any legal constraints;
- ensure constant improvement of the processing measures adopted for the protection of the personal data of customers and interested parties in business management and the provision of ICT services;
- prevent and manage information security events and/or incidents and/or personal data breaches by collecting and retaining records thereof, including for judicial purposes and improvement programs;
- promote and implement targeted or widespread training and awareness-raising plans on information security.

1.14 Travel Risk Management (TRM) Policy

The Company aware of the importance of ensuring the safety, health and welfare of its corporate travelers, adopts a structured Travel Risk Management (TRM) in line with the principles of ISO 31030. This policy applies to all corporate travelers, including employees, consultants and partners, covering domestic and international travel.

Impresa Pizzarotti & C. S.p.A. is committed to:

- Integrate, within the broader strategy of protecting human capital and operational sustainability, support for travelers that ensures their physical and personal safety, logistical support, health and psychological care, and continuous communication between travelers and support staff.
- Conduct pre-trip risk assessments associated with different destinations and types of travel, taking into account staff safety, health conditions and pandemic risks, local regulations, cultural risks, and natural events.
- Promote and implement training and awareness campaigns on security practices and emergency procedures, taking care of periodic updates on new and emerging risks.
- Implement real-time monitoring technologies and systems to track the location of travelers and manage critical situations including through rapid communications in case of emergencies or changes that impact their safety.
- Establish detailed protocols for incident management, including early warning systems, evacuation plans, emergency medical care, and constant support lines.
- Maintain a comprehensive and sustainable approach to traveler safety by taking a strategic view of risks in line with the organization's overall sustainability goals.
- Choose vendors and partners involved in supporting travel (such as insurance, transportation, lodging, and medical services) that have the capacity to ensure safety, continuity of services, and compliance with local regulations and that are managed to minimize risks associated with destinations and travel arrangements
- Ensure that Travel Risk Management supports business continuity plans so that critical business resources and processes can continue during emergency situations, including management of vendors and external resources needed to maintain operations in the event of global or local disruptions.
- Consider time off associated with travel, multiple travelers and companions, including the careful management of any exceptions in a documented manner and according to precise approval criteria.
- periodically review the TRM policy to ensure its adequacy with respect to changes in the global risk landscape and business operations, adopting innovative practices aligned with best international standards.

1.15 Stakeholder Engagement Policy

Impresa Pizzarotti & C. S.p.A. recognizes the structured involvement of stakeholders as an essential and qualifying element of its business model and as a relevant tool for identifying and managing impacts on human rights, working conditions, the environment, and sustainability along the value chain.

In accordance with the Code of Ethics, the SA8000 standard, the GRI Standards, the ISO 26000 guidelines, and applicable references regarding sustainability reporting, the Company undertakes to promote a structured, continuous, and transparent dialogue, based on the principles of inclusiveness, integrity, and responsibility.

The Company's commitment to Stakeholder Engagement is manifested through:

Identification and mapping: the periodic updating of the mapping of its stakeholders, including employees, trade unions, clients, suppliers, local communities, institutions, investors, and civil society organizations, and the definition of engagement priorities based on criteria of influence, impact, risk, and strategic relevance;

Double materiality analysis: the use of engagement activities to gather evidence, information, and perspectives useful for identifying:

- the current and potential impacts of company activities on people, the environment, and local areas, within the scope of impact materiality;
- the financial risks and opportunities related to environmental, social, and governance issues, within the scope of financial materiality;

ensuring that the assessment of material topics is supported by internal and external evidence and adequately takes into account the perspectives of relevant stakeholders.

Engagement methods: the adoption of listening and dialogue tools appropriate to the operational context, the nature of the impacts, and the type of stakeholder, such as discussion tables, consultations, surveys, social audits, meetings, and digital channels. Particular attention is given to sensitive local contexts and stakeholders potentially affected by the impacts of the Company's activities.

Supply chain management: the recognition of suppliers and subcontractors as key partners in the creation of sustainable value. The Company integrates ESG criteria and indicators into qualification, selection, and monitoring processes, also through recognized assessment tools and platforms, considering ESG performance together with technical, economic, contractual, and operational requirements, and promoting improvement initiatives where appropriate.

Management of feedback and reports: the availability of accessible and appropriate channels for collecting feedback, complaints, and suggestions from internal and external stakeholders, ensuring their proper evaluation and use for the improvement of company processes. Reports falling within the scope of whistleblowing regulations are managed through specific company channels, in compliance with confidentiality obligations and the protections provided by applicable regulations.

The Company periodically monitors the effectiveness of engagement activities and integrates the results, where relevant, into decision-making processes, impact management, and sustainability reporting, in order to strengthen mutual trust and the creation of shared value over the long term.

1.16 Policy for the Protection of Personal Data

The Company Pizzarotti & C. S.p.A. recognizes the protection of personal data as a fundamental value and an integral part of its corporate responsibility.

By **"processing of personal data"** is meant any operation, carried out with or without the aid of electronic or paper tools, concerning personal data and enabling their use, communication, or dissemination within the permitted limits.

The Company ensures that all personal data and information processed in the course of its activities are adequately protected throughout their entire lifecycle: from collection to registration, from storage to use, up to their deletion.

In accordance with Regulation (EU) 2016/679 – GDPR, with applicable national legislation and the principles of lawfulness, fairness, transparency, minimization, and accountability, the Company undertakes to:

- **ensure the confidentiality of personal data**, ensuring that processing is carried out exclusively by authorized persons and for legitimate purposes, through the adoption of appropriate technical and organizational

measures to prevent unauthorized access, improper disclosure, or uses not in compliance with the principles of the GDPR;

- **ensure the integrity of data and information**, protecting them from unauthorized modifications, accidental or malicious alterations, loss or damage, both with reference to the informational content and to the physical and digital media on which personal data are processed and stored;
- **safeguard the availability of personal data**, ensuring that they are accessible and usable in a timely and reliable manner by authorized persons, in compliance with operational and service needs, as well as the fundamental rights and freedoms of data subjects;
- **implement a structured and continuous approach to the analysis and management of risks** related to the processing of personal data and information security, in line with the principle of *privacy by design and by default*, adapting internal controls to the evolution of threats, the organizational context, and the technologies adopted, including aspects of cybersecurity;
- **constantly monitor the security level of information systems** and the compliance of processing with applicable regulations, internal policies, and operational instructions, ensuring compliance with personal data protection obligations throughout the entire company process chain;
- **promote the continuous improvement of personal data protection measures**, paying particular attention to processing involving employees, collaborators, clients, suppliers, partners, and, more generally, all stakeholders and interested parties;
- **prevent, detect, and effectively manage security incidents and personal data breaches (data breach)**, ensuring adequate processes for reporting, recording, retention, and analysis of events, as well as compliance with notification obligations to the competent Authorities and data subjects, where applicable;
- **promote the training and awareness of personnel** at all levels of the organization, disseminating a corporate culture oriented towards information security, the protection of personal data, and respect for the rights of data subjects, as an essential element of corporate governance.

1.17 Policy for the Responsible Use of Artificial Intelligence

Impresa Pizzarotti & C. S.p.A. recognizes Artificial Intelligence, hereinafter also referred to as “AI”, as a strategic tool to support decision-making, operational, and control processes, capable of enhancing the effectiveness of the Integrated Management System, innovation, and continuous improvement, in compliance with corporate values, fundamental human rights, and human responsibility.

Artificial Intelligence must be used as a support tool and cannot entail the transfer to technological systems of the responsibility attributed to individuals and corporate functions.

In accordance with Regulation (EU) 2024/1689 – AI Act and subsequent amendments and additions, with Regulation (EU) 2016/679 – GDPR, with Law 23 September 2025, no. 132 and taking into account the principles of ISO 9001 and ISO/IEC 27001 standards, the Company adopts a responsible, proportionate, and risk-based approach, ensuring that the use of AI is compliant, safe, transparent, ethical, and oriented towards the creation of sustainable value.

The Company undertakes to:

- define and maintain a structured model of Artificial Intelligence governance, regulating roles, responsibilities, competencies, authorizations, and controls relating to the acquisition, development, configuration, and use of AI systems, ensuring accountability, human oversight, and traceability of decisions;
- determine and document, for each AI system, the role assumed by the Company pursuant to the applicable legislation, including as supplier, deployer, importer, distributor, or manufacturer of the product, ensuring fulfillment of the resulting obligations;
- apply a risk-based approach aimed at identifying, assessing, and mitigating risks associated with AI systems, with particular attention to impacts on fundamental rights, safety, process reliability, and protection of personal data;
- exclude the adoption and use of Artificial Intelligence systems or practices prohibited by applicable law and prevent improper, manipulative, discriminatory, or otherwise incompatible uses with the fundamental rights of individuals;
- maintain an up-to-date inventory of AI systems adopted or used by the Company and ensure, in proportion to the role assumed and the level of risk, the availability of the related documentation, containing at least the purpose of the system, the processes involved, the responsible functions, risk classification, categories of data processed, methods of human oversight, usage limits, controls applied, and documentation provided by the supplier;
- ensure transparency in the use of AI, guaranteeing that the purposes, capabilities, and limitations of the systems are adequately known to users and that the related outputs are understandable, contextualized, and used consistently with the authorized purposes, without replacing human responsibility and judgment, particularly in critical processes;
- ensure that outputs produced by AI systems are verified by competent personnel in terms of accuracy, completeness, consistency, reliability, and suitability for the intended purpose, prior to their use in business processes or their communication to external parties;
- ensure that decisions having significant effects on individuals, workers, health and safety, contractual relationships, regulatory compliance or other critical processes are not made solely on the basis of theoutput of an AI system, without aneffective evaluation and assumption of responsibility by authorized personnel;
- ensure, where required by applicable law, that individuals are informed of interactions with AI systems and that artificially generated or manipulated content is adequately identified or marked;
- use AI systems in compliance with intellectual property rights, copyright, trade secrets, license conditions, contractual limitations, and third-party rights, ensuring the legitimate availability of the data and content used;
- prohibit the unauthorized use of Artificial Intelligence systems or functionalities, including those provided by third parties, such as online or cloud services, desktop applications, extensions, functionalities integrated into other applications, API interfaces, and locally installed models, if they have not been previously evaluated and approved by the Company;

- prohibit the input, sharing, or processing of corporate information and personal data through Artificial Intelligence systems not previously approved by the Company. Processing through authorized systems is permitted exclusively in compliance with the classification of information, the authorized purposes and methods of use, the principles of necessity and minimization, the authorizations granted to users, and the contractual, technical, and organizational measures defined by the Company;
- ensure that the use of information classified as reserved, confidential, or strategic, as well as personal data, takes place exclusively through systems specifically authorized for such categories of information and after verification of the relevant guarantees of security, confidentiality, storage, localization, and deletion of data;
- prohibit the use of Artificial Intelligence systems that employ the user's data, inputs, or outputs for purposes of training, learning, profiling, or reuse by the supplier, unless such processing has been previously evaluated and authorized by the Company and is governed by appropriate contractual, technical, and organizational safeguards;
- to safeguard personal data, limiting its use to what is strictly necessary in relation to the authorized purposes, adopting appropriate security measures, and ensuring respect for the rights of the data subjects;
- to carry out, in the cases provided for by'article 35 of Regulation (EU) 2016/679, the assessment'of the impact on the protection of personal data– Data Protection Impact Assessment (DPIA) – ensuring the prior involvement of the functions responsible for personal data protection and information security;
- to carry out, where applicable and in the cases provided for by'article 27 of Regulation (EU) 2024/1689, the assessment'of the impact on fundamental rights– Fundamental Rights Impact Assessment (FRIA) – coordinating it, when necessary, with the assessment'of the impact on the protection of personal data;
- to ensure effective human oversight of the use of AI, entrusting it to competent personnel, adequately trained and vested with the necessary authority to understand its capabilities and limitations, interpret its outputs, intervene in its operation, and, where necessary, suspend or discontinue its use;
- to regulate, through specific contractual clauses, the relationships with AI system suppliers, with particular reference to the purposes⟧ of use, the security and confidentiality of data, their possible reuse for training purposes⟧, human supervision, the availability⟧ of records, incident management, cooperation in control and audit activities, and the allocation of responsibilities⟧ arising from⟧ the use of the systems;'⟧
- to promote structured internal training and awareness programs aimed at developing adequate literacy on Artificial Intelligence, the related benefits and risks, the obligations set forth by applicable regulations, and the correct methods of using AI systems, according to roles, skills, and corporate responsibilities;
- to inform in advance the affected workers and their representatives, in the cases provided for by applicable regulations, prior to the commissioning or use of high-risk AI systems in the workplace;
- to use Artificial Intelligence as an enabling factor for continuous improvement, supporting data analysis, performance monitoring, identification of non-conformities, risks, and opportunities for process improvement;

- to provide methods for reporting, recording, evaluating, and managing anomalies, malfunctions, incorrect or unreliable outputs, improper uses, incidents, and violations related to the use of AI systems, ensuring the prompt involvement of the competent functions;
- to monitor and periodically review the effectiveness, security, and compliance of the use of AI systems and related corporate safeguards, through internal audits, management reviews, and continuous improvement actions, ensuring adaptation to regulatory, technological, and organizational developments.

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