

The Company Management, considering the organisational environment, assessing the company's size, taking in to account the products and services offered to the customer, and after examining the assessments on the possible significant environmental impacts, the health risks of workers resulting from the normal productive cycle, **formally assumes** the commitment to a policy that evaluates, in an appropriate manner, the efficiency of the management system and tends to maintain and improve the level of quality achieved, the current conditions of environmental protection and health and safety of workers. The policy has recently been implemented by the interest of the Company in the fight against corruption, with the aim at the continuous improvement of their organization in order to manage the risk of corruption from the point of view of zero tolerance.

The Company, therefore, undertakes to address the quality, environment and safety aspects of all existing business activities and future planning as important aspects of its business. It undertakes, also, to organize the entire company structure, from the employer, RSPP, supervisors, security officers, employees, casual workers so that everyone is involved, according to their responsibilities and skills, to achieve the objectives assigned

For this purpose, the Company Management appoints the Manager of the Management System (RSG) to whom it confers the necessary organizational authority and autonomy, so as to ensure the implementation, maintenance and updating of the Integrated Management System. All company levels, each for the part of their competence, are responsible for the implementation of the System under the coordination and supervision of the RSG.

Therefore, in order to achieve the primary objective of customer satisfaction, respect for nature and the environment and the health and safety of workers, it undertakes to:

- Maintain an integrated management system for quality, environment and safety in compliance with the UNI EN ISO 37001: 2016 standards for the Prevention of Corruption, ISO 9001: 2015, ISO 14001: 2015, UNI ISO 45001:2018;
- Prohibit corruption;
- Consider compliance with the current legislation, with particular reference to health and safety at work, to the laws for the prevention of corruption applicable to the Organization, to the protection of the environment;
- Pay close attention to the management of the corruption risk related to the Organization by adopting the necessary measures in consideration of the Organization itself;
- Ensure integration with the Company's Organization, Management and Control Model;
- Allow interactions between the Anti-Corruption System with the Code of Ethics;
- Carry out the assessment of the corruption risk connected to the activities of the Organization;
- Identify the framework for establishing, reviewing, and meeting the objectives for preventing corruption;
- Encourage reporting of suspects in *bona fides*, or on the basis of a reasonable and confidential conviction, without fear of retaliation;
- Identify the Corruption Prevention Compliance Function so that it is authoritative and independent;
- Inform all workers and business associates in the proper languages that have in place a risk of corruption that is higher than the downside, on the role of the Compliance Function for the Prevention of Corruption and on the consequences of actions that do not comply with the Corruption Prevention Policy;
- Make the Anti-Corruption Policy available to relevant stakeholders, in the most appropriate way for the purposes of the Management System for the Prevention of Corruption of the Organization;
- Identify business processes and monitor their efficiency and effectiveness;
- Carry out an environmental analysis and assessment of the risks present in the company;
- Train and inform all workers, with particular reference to health and safety risks;

- Communicate transparently with customers, suppliers, workers and all other interested parties;
- Preventing pollution and protecting natural resources;
- Ensure consultation of workers, including through their representative, on aspects of occupational safety and health;
- Implement the design of the machines, plants and equipment, workplaces, operating methods and organizational aspects in order to safeguard the health of workers, third parties and the community in which the company operates;
- To promote COOPERATION among the various company resources, COLLABORATION with the business organizations and with appointed external bodies;
- Make available the necessary economic, human and instrumental resources;
- Privilege preventive actions and internal investigations to protect workers' health and safety, in order to significantly REDUCE the probability of occurrence of ACCIDENTS, INJURIES or other non-compliance;
- Periodically review the Policy, the Objectives and the implementation of the Integrated System in order to achieve continuous improvement in terms of quality, anti-corruption culture, environment, health and safety at work;

The objectives that our Organization aims to achieve are:

- Identify, monitor and manage its significant anti-corruption aspects;
- Reduce the production of waste and in particular the packaging of the supplied products;
- Monitor energy consumption and evaluate the use of alternative forms of energy;
- Identify, monitor and manage its significant environmental aspects;
- Evaluate in advance the environmental impacts of new processes and modifications of existing plants;
- Evaluate the anti-corruption impacts of new processes in advance;
- Always maintain a high level of customer satisfaction by ensuring the realization of the works and the provision of the service in the agreed time and manner;
- Promote the responsibility of employees of all levels towards the culture of anti-corruption, protection of the environment and workers and implement information and training programs for personnel on quality, environment, anti-corruption and security;
- Take the necessary measures to reduce risk situations and the environmental impact connected to emergency situations;
- Ensure transparent cooperation with inspection and public authorities;
- Employ means and equipment that guarantee the necessary safety of workers and the lowest risk to the environment;
- To achieve a constant improvement in the separate collection of waste, in the protection of water, soil and subsoil and air;
- Monitor injuries and dangerous situations.

The violation of the Policy involves the application of disciplinary sanctions or penalties as described in the Company's Organization, Management and Control Model.

Malcontenta (VE), 07/02/2019

Company Management
(Boris Barbugian)