

Politica

Integrated policy social responsibility, environment, health and safety, energy, quality, medical, information security, business continuity, gender equality, diversity, equity, and inclusion

The Oldrati Group has always considered sustainability to be one of the pillars of our future, a key element on which to base responsible development strategies and a factor in ensuring business continuity.

This concept implies a strong focus on issues such as respect for human rights, protection of integrity, health, rights, and well-being of our employees, as well as the environment.

To ensure that this model is respected, the Group invests in research and training, with a constant focus on improving production processes, demonstrating leadership and commitment, and guaranteeing the availability of the resources necessary to achieve its objectives.

The Integrated Management System in all its parts and its constant adaptation to the evolution of the company and the regulatory landscape constitute a fundamental governance tool based on the principle of continuous improvement for the control and optimization of business processes through the adoption of best practices dictated by international standards.

The Group's objectives are planned according to a risk-based approach, taking into account: context analysis, internal and external factors, stakeholders, purpose and scope, and integrated policy.

The coordination of the activities necessary to achieve the objectives of the integrated management system is carried out by the Quality Department, also following the inputs/outputs that emerge during company committee meetings, allowing the resources necessary for the various activities to be allocated and the dates by which these activities must be completed to be defined.

The Group's main objectives are then summarized and monitored through Management Review.

Oldrati has therefore implemented and maintains an Integrated Management System based on the standards ISO 9001:2015, IATF 16949, ISO 14001:2015, ISO 13485:2016, ISO 50001:2018, PdR 125:2022, UNI ISO 30415:2021 and TISAX, considering it a fundamental principle for achieving business objectives and with a view to continuous sustainable development.

This policy is disseminated to all Group companies and made public.

Social Responsibility Policy - CSR (Corporate Social Responsibility) - Code of Ethics (Ref. CP001) - Code of Conduct (Ref. CP002)

- Govern activities on health, safety, labor rights, and the environment in accordance with international standards;
- Communicating and disseminating information on the above points to internal and external stakeholders, actively collaborating with them at both national and international level. This is also achieved with the support of institutional and academic organizations;
- Promoting the use of the most advanced technologies while protecting workers' health, safety at work, and the environment;
- Reducing the environmental impact of the life cycle of each product;
- Use resources responsibly, promoting sustainable development that respects the environment and the rights of future generations;
- Prohibit child labor;
- Ensure equal opportunities and freedom of association, promoting the development of each individual;
- Oppose the use of corporal punishment, mental or physical coercion, or verbal abuse;
- Respect laws and industry standards regarding working hours and ensure that wages meet the basic needs of personnel;
- Establish and maintain procedures to evaluate and select suppliers and subcontractors based on their level of social and environmental responsibility;
- Not tolerate any form of corruption in any form or manner, in any jurisdiction, even where such activities are in practice accepted, tolerated, or not prosecuted;
- Involve all levels of the organization and all Group employees, ensuring that responsibilities and operating procedures are clearly defined, appropriately communicated, and clearly understood.

Gender Equality, Diversity, Equity, and Inclusion Policy

The Management, with the support of the Gender Equality Steering Committee, formally undertakes to promote a management policy that promotes gender equality (all genders), female empowerment, equal opportunities, inclusiveness, respect and the enhancement of diversity and, consequently, defines the following strategic guidelines and policies with regard to organizational culture, practices and processes:

Offering equal opportunities in all aspects of working life, in the selection process, as well as in decisions regarding remuneration, job assignment, training and career progression, and performance evaluation; These processes and decisions are guided by criteria based exclusively on the skills, experience, and professional potential of the individuals concerned and on the results achieved, without any distinction based on gender, gender identity and expression, sexual orientation, marital status, pregnancy, parenthood, or caregiving status. age, disability (mental or physical), skin color, ethnic origin, nationality, religious beliefs, socioeconomic and/or cultural background, union membership, political or other opinions;

Promote gender equality in recruitment, ensuring that those involved in the hiring process, such as recruiters and managers, receive adequate training on diversity, gender equality, and stereotypes and biases that may negatively impact the selection process;

Ensure equal pay for equal work and skills: remuneration, performance appraisal processes and short- and long-term incentive schemes, taking into account the context and applicable market benchmarks, are based solely on the recognition of responsibilities, results achieved and the quality of professional input, without any discrimination.

Ensure mechanisms to protect jobs and the same level of remuneration after maternity leave and in the context of parental leave policies;

Promote processes to support employees returning to work after long periods of absence (maternity, paternity, illness);

Ensure fair, inclusive, and equal participation in training and skills development programs and access to leadership positions;

Support and value parenthood and caregiving through specific welfare programs;

Consolidate and maintain work-life balance and flexible working policies;

Ensure that all stakeholders (employees, suppliers, customers, candidates, etc.) enjoy working and business relationships based on dignity and mutual respect. Not tolerate and commit to preventing all forms of discrimination, verbal, digital, psychological, physical (sexual or non-sexual) harassment, abuse, coercion, or violence; if such behavior is encountered, commit to taking action to stop it and remedy it.

Ensure that genders are equally represented among panel speakers at round tables, events, conferences, or other events, including those of a technical or scientific nature.

Communicate internally and externally in an inclusive, non-discriminatory manner, avoiding stereotypes and using language that respects all differences.

Ethical Escalation Policy (Whistleblowing)

Whistleblowing is a fundamental compliance tool for the Oldrati Group, through which employees or third parties (e.g., suppliers or customers) can confidentially and securely report any illegal activities they encounter during their work.

The term "whistleblower" is a metaphor for the role of referee or police officer assumed by those who draw attention to and report unauthorized or illegal activities so that they can be stopped.

A whistleblower is therefore a person working in a company who decides to report an illegal act, fraud, or danger that they have detected during their work.

Consequently, whistleblowing is the practice of reporting violations of laws or regulations, crimes, and cases of corruption or fraud, as well as situations that pose a threat to the health and safety of the company.

Quality Policy

- Developing our Integrated Management System in accordance with the relevant standards and ensuring that it is appropriate to our business;
- Understanding quality as customer satisfaction, in full compliance with objectives consistent with the Group's strategies;
- Considering quality a shared responsibility within the Group;
- Achieve the highest level of quality at the lowest cost;
- Continuously improve business processes and product quality;
- Plan, implement, and control the quality of items with special characteristics in order to ensure the delivery of defect-free products;
- Not accepting any compromise on product safety;
- Take an active leadership role in improving quality.

Medical Device Quality Policy

- Protect the safety of patients, users, and third parties;
- Comply with applicable regulatory and statutory requirements;
- Ensure the effectiveness and safety of the products we supply to our customers so that they meet their requirements (CSR);
- Satisfaction of all parties.

Environmental, safety and health policy

- **Regulatory Compliance:** Comply fully with current legislation and applicable requirements (including all other environmental regulations) and reference standards, monitoring their application, whether mandatory or internal to the organization.
- **Reduction of Environmental Impacts:** Use, within the limits of technological applicability and carefully assessing the impact on the business, products and services that minimize environmental impacts and significantly reduce GHG emissions and environmental impact in general, ensuring the supply of efficient products and services and supporting design activities in terms of environmental sustainability.
- **Diagnosis and Monitoring:** Identify the activities and/or areas responsible for environmental impacts through environmental diagnosis and continuous monitoring in order to identify opportunities that can be translated into objectives, enabling continuous improvement of environmental performance through the implementation of corrective and improvement measures.
- **Innovation and Opportunities:** Seize all opportunities related to innovation, subsidies, tax and contractual opportunities that have an impact on opportunities related to environmental performance.
- **Optimal Use of Resources:** Promote the optimal use of natural resources with a view to saving, while maintaining the output derived from their use (production of goods/services, comfort for employees, etc.).
- **Environmental Management System:** Maintain an active Environmental Management System that complies with the requirements of UNI EN ISO 14001:2015 and aims to continuously improve its environmental performance, according to the "PLAN-DO-CHECK-ACT" (PDCA) methodological framework, exercising constant control (including through internal and external auditing) over the environmental impact of every business operation, from strategic decisions to operational activities.
- **Communication and Awareness:** Systematically share information on this Management System with company stakeholders (internal and external); in particular, publish the company's best practices in terms of environmental performance on its website, with the aim of raising awareness of increasingly sustainable management among the industrial and manufacturing companies with which it collaborates.
- **Training and Empowerment:** Continuously and consistently train and empower staff (internal and external) to use natural resources responsibly and efficiently; specifically raise awareness among suppliers that environmental sustainability parameters will also be taken into account alongside quality and economic parameters when evaluating supplies.

Energy Policy

- Comply fully with current legislation and applicable requirements (including any other energy or environmental regulations) and reference standards, ensuring that they are applied, whether mandatory or internal to the organization.
- Use, to the extent technologically feasible and carefully assessing the impact on the business, products and services that minimize energy impacts and significantly reduce GHG emissions and the overall environmental impact, including by ensuring the procurement of efficient products and services and supporting design activities in terms of energy efficiency;
- Identify the activities and/or areas responsible for energy consumption through Energy Audits and continuous monitoring, in order to identify Opportunities that can be translated into Objectives, allowing for continuous improvement in energy efficiency through the implementation of corrective and improvement measures;
- Seize all opportunities related to innovation, subsidies, tax and contractual opportunities that have an impact on opportunities related to energy performance;
- Promote the optimal use of energy resources with a view to saving energy while maintaining the output derived from their use (production of goods/services, employee comfort, etc.);
- Maintain an active Energy Management System, compliant with the requirements of UNI EN ISO 50001:2018 and aimed at continuously improving its energy performance, according to the "PLAN-DO-CHECK-ACT" (PDCA) methodological scheme; exercising constant control (including through internal and external auditing) over the energy impact of every business operation, from strategic decisions to operational activities, and "designing" equivalent management systems;
- Systematically sharing information on this management system with company stakeholders (both internal and external); in particular, publishing the company's best practices in terms of energy efficiency on its website, with the aim of raising awareness of increasingly sustainable management among the industrial and manufacturing companies with which it collaborates.
- Continuously and consistently train and empower staff (internal and external) to use energy responsibly and efficiently; specifically raise awareness among suppliers that **energy and environmental sustainability** parameters will also be taken into account alongside quality and economic parameters when evaluating supplies.

Information Security Policy

Protecting the company's information assets by ensuring confidentiality, integrity, and availability through:

- The definition of technical, organizational, and procedural measures to protect information;
- Verifying the adequacy of personnel and providing training;
- Verifying the correct application of the planned protection measures;
- Measuring compliance with and efficiency of the information security management system by continuously reviewing the results achieved to identify opportunities for improving the level of security.

Business Continuity Management Policy

Ensuring Business Continuity through:

- Guaranteeing the safety of personnel in the event of an emergency;
- Ensuring essential functions and guaranteeing service to customers;
- Maintaining the company's obligations towards its employees, customers, shareholders, and third parties;
- Minimizing potential financial losses and the impact on business activities;
- Reducing the effects on operations by providing guidelines for recovering and restoring business operations following a contingency scenario;
- Protecting the brand and preserving the company's image, credibility, and customer trust;
- Compliance with regulatory obligations and requirements.

Ensuring the maintenance and improvement of performance through:

- formal planning in accordance with the integrated management system for all activities;
- verifying the adequacy of resources;
- verifying the correct execution of planned activities;
- measuring compliance with and efficiency of the integrated management system through continuous review of the results achieved to identify opportunities for improvement in service and product quality, safety, environmental and energy performance;
- promoting a corporate culture focused on quality and energy efficiency;
- identifying and communicating the achievement of concrete objectives.

Disseminate the "Integrated Policy" at all levels of the Company and strictly comply with its contents.

The Management appoints the TQM manager as its representative to verify the proper functioning of the OLDRATI GROUP's integrated management system and must report to the CEO in the event of significant procedural deviations.

The Management appoints the ICT Security Manager as its representative to verify the correct functioning of the OLDRATI GROUP's information security management system and must report to the Chairman in the event of significant procedural deviations.

The correct and effective application of this Policy, the IMS, and its updating is also ensured through internal and external audits, with periodic review of the IMS and the Policy itself.

The principles of the Policy are made known within the Group and to all interested parties, to guarantee transparency and the commitments undertaken by Oldrati.

Management declares that the Management System Manuals comply with the following standards: UNI EN ISO 9001:2015, IATF 16949:2016, ISO 14001:2015, ISO 13485:2021, ISO 50001:2018, PdR 125:2022, ISO 30415:2021, and TISAX.

These outline the management methods and responsibilities for implementing the quality, medical, health, safety, environmental, and energy management systems.