

QUALITY, ENVIRONMENT, SAFETY AND SUSTAINABILITY POLICY OF THE COGEME ORGANIZATION

The Cogeme organization believes that the quality of products, resources and processes, together with compliance with ethical principles, environmental sustainability, respect of human rights and of the health and safety of workers are decisive factors for the success of a company in terms of profit and image.

The quality of company products, understood, as compliance with the requirements of the Customer's needs, can't be separated from a concept of total quality in which the aspects related to the protection of the individual and the environment are located.

PROGRAM

In order to obtain, document and guarantee compliance with the requirements of products and services requested by Customers and compliance with environmental and health and safety aspects in the workplace, the organisation has undertaken a program that has its strength point in the application of a Company Management System (Quality/Environment/Safety) which is reflected in the reference standards ISO 9001, IATF 16949, ISO 14001 and ISO 45001.

The Management undertakes to operate in full compliance with the applicable legislative requirements (locally and internationally) and to make available the human, economic and technological resources necessary for the achievement and maintenance, both in the Cogeme Organization and through the supply chain, the Organization's policy expressed through the following principles:

Quality policy

- *Continuous growth of the technical-professional level*

Through training courses and staff updating, the company considers professional growth as an essential condition to take full advantage of technological opportunities, of the system for work organization, of communication and safety systems.

- *Customer Satisfaction*

Improvement the Customer satisfaction through: implementation of the "Zero Defects" and "Zero Interruptions" policy, on-time delivery, maximum attention to all Customer requirements including cost reduction.

- *Reduction of internal charges*

Reduction of working capital both through rational production plans exploiting the potential of automatic calculation and punctual checks of raw materials, semi-finished products and finished products.

- *Control and reduction of non-quality costs*

Sensitising staff with meetings and periodic reports, identifying incentives to stimulate productivity and growth in terms of quality.

- *Supplier involvement*

Through the growth of qualified Suppliers, sharing with them the Customer requirements, providing them the appropriate knowledge, means and/or methodologies, making them part of the necessity for the improvement.

- *Continuous improvement and innovation*

Through the constant analysis of the Organisation's processes and the execution of investments aimed at introducing new production and control methodologies and/or technologies.

- *Risk management*

The commitment to plan, implement, monitor, review and continuously improve the risk management process throughout the organisation.

Automotive Sustainability guiding principles

Cogeme is committed to operating in compliance with the guiding principles of the automotive sector to which the main European car manufacturers adhere and which define the rules of: Corporate ethics; Environmental standards; Human rights and working conditions; Health & Safety; Responsible supply chain management.

1) Business Ethics

Cogeme organization is committed to implement a management system for business ethics that includes the following:

- *Anti-Corruption and Anti-Money Laundering*

Commitment not to participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. Commitment not to facilitate or support money laundering. Commitment to report any suspicious transactions and be alert for signs of money laundering.

- *Data Protection and Data Security*

Commitment to respect the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.

- *Financial Responsibility/Accurate Records*

Commitment to perform their business dealings in a transparent manner and accurately reflect them in the companies' financial reports and filings. Implementation of an appropriate financial reporting control system.

- *Disclosure of Information*

Commitment to disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

- *Conflicts of Interest*

To ensure that employees avoid and disclose situations in which their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.

- *Counterfeit Parts*

Minimize the risk of introducing counterfeit and/or diverted parts and materials into the deliverable products and comply with relevant technical regulations in the product design process.

- *Intellectual Property*

To respect valid intellectual property rights

- *Export Controls, Trade, and Economic Sanctions*

To comply with applicable restrictions on the export or re-export of goods, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

- *Grievance Mechanism*

Establishment of an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.

- *Remediation*

To provide or cooperate in remediation through legitimate processes when business activities cause or contribute to adverse environmental or social impacts..

- *Non-retaliation*

To avoid any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly and protest against their business activities.

- *External relations*

Constant dialogue with its employees, with suppliers, with the public and with the competent authorities on the objectives of improving their performances, through: information actions of the interested parties (workers, trade unions, suppliers) on the commitments of this Policy. Publication of the same on the company website in order to make it available to the public.

2) Environment

Cogeme Organization is committed to developing, implementing and supporting a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods and services throughout their life cycle, through the implementation of an environmental management system that includes the following:

- *Environmental legislation*

Commitment to operate in full compliance with the applicable requirements of European, Italian or Regional legislation about the environment and energy utilization.

- *Training and information*

Involvement of all staff in responsibility towards environmental aspects, through suitable training, information, training, awareness-raising initiatives and knowledge of the company's policy, in significant environmental impacts, on energy savings and performance. Training on significant environmental impacts and risks associated with the organization's activities with particular focus on continuous improvement of performance and achievement of environmental objectives.

- *Carbon Neutrality*

Commitment to setting objectives for reducing emissions and using renewable energy based on scientific data and with precise deadlines in line with the Paris Agreement and implementing measures that advance the decarbonisation of the entire value chain, including through continuous technological improvement of processes; the promotion of activities and production methods aimed at optimizing energy consumption.

- *Water Quality, Consumption & Management*

Commitment to minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges and prevent potential impacts from flooding as a consequence of rainwater run-off, as required by and in accordance with applicable law.

- *Air Quality*

Monitoring and disclose routinely, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to air pollution, as required by and in accordance with applicable law. To assess the cumulative impacts of pollution sources at their facilities and mitigate our pollution levels accordingly.

- *Responsible Chemical Management*

To identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. To evaluate and monitoring of any use of restricted substances in processes and finished products, and actively investigate suitable substitutes to maintain product and environmental stewardship

- *Circularity and waste reduction*

To promote closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

- *Animal Welfare*

Actually not applicable to Cogeme processes and products, will be re-evaluated if this condition changes in the future.

- *Biodiversity, Land Use and Deforestation*

To protect ecosystems, especially key biodiversity areas, impacted by our operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.

- *Management of environmental emergencies*

Commitment to adopt the operating procedures necessary to prevent, contain and deal with accidental environmental accidents.

- *Soil Quality*

Commitment to monitoring and control impact of our activities on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

- *Noise Emissions*

To monitor and control the levels of industrial noise to avoid noise pollution.

3) Human Rights and Working Conditions

The Cogeme organization is committed to respecting the human rights of workers, local communities and other stakeholders, as well as preventing and addressing adverse human rights impacts related to its business activities, in accordance with the Guiding Principles on Business and Human Rights of the United Nations. Cogeme organization is committed to implement a management system for human rights and working conditions that includes the following:

- *Child Labor/Labour and Young Workers*

To observe the minimum employment age in their business activities and throughout our supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labour is not tolerated in any form.

- *Wages and Benefits*

To provide our workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave and government-mandated benefits

- *Working Hours*

To respect local laws and collective bargaining agreements (where applicable) regarding working hours, or should comply with the ILO Standards on Working Time* in the absence of relevant local regulations.

- *Modern Slavery*

To prohibit any forms of forced, bonded or compulsory labour, including human trafficking.

- *Ethical Recruiting*

To not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

- *Freedom of Association and Collective Bargaining*

To allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. To respect worker rights to associate freely, to join or not join labour unions, bargain collectively, seek representation and join workers' councils.

- *Non-Discrimination and Harassment*

Commitment to not tolerate any form of discrimination or harassment in respect of employment and occupation and to provide equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.

- *Women's Rights*

To provide equal opportunity in employment and commit to equal pay for equal work.

- *Diversity, Equity, and Inclusion*

To develop and promote inclusive cultures where diversity is valued and celebrated, and everyone is able to contribute fully and reach their full potential. To encourage diversity in all levels of their workforce and leadership, including boards of directors.

- *Rights of Minorities and Indigenous Peoples*

Commitment to respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups

- *Land Rights and Forced Eviction*

To avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

- *Private or Public Security Forces*

Do not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

4) Health and Safety

The Cogeme organization guarantees workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards regarding occupational safety and health.

Cogeme organization is committed to implement a management system for safe and healthy working environment that includes the following:

- *Health and Safety Legislation*

Commitment to operate in full compliance with the applicable requirements of local, national and international legislation on health and safety in the workplace

- *Continuous improvement*

Commitment to raise the level of its performance in terms of the safety of its workers, taking into account the Health and Safety standards established by national laws and various local regulations and involving all staff in the continuous improvement of performance and achievement of objectives.

- *Change management*

Commitment to re-evaluate aspects of occupational health and safety when defining new activities or reviewing existing activities or processes. Risk assessment activities are planned for the introduction of new processes, new machinery, new management procedures or the modification of existing ones.

- *Training and involvement*

Involvement of all workers for health and safety aspects, through: definition and communication of improvement objectives; training, information and motivation of employees to carry out their duties in compliance with safety procedures and in compliance with the principles of this policy; developing a sense of responsibility for the health and safety of oneself, colleagues and third parties; dialogue and discussion with its employees, who are called to collaborate and report health and safety issues.

- *Reduction of risks for the health and safety of workers*

Commitment to operate in such a way as to minimize the risks to health and safety for workers, through: the use of prevention and protection measures; the definition of working methods and procedures; raising awareness and training of employees; the use of Personal Protective Equipment (PPE); the definition of working instruction and individual protection for handling dangerous substances.

- *Workplace ergonomics and Workspace*

Commitment to monitor and possibly improve the ergonomics of the workstations, carrying out periodic reviews and appropriately defining the workstations in the event of extensions or changes to the existing layouts.

Commitment to provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.

- *Machine safety*

Adoption of periodic inspection and verification plans, aimed at confirming the compliance and safety in the use of its machines and systems, as well as purchasing procedures for new certified machinery in accordance with the applicable directives.

- *Personal Protective Equipment*

To provide our workforce with necessary Personal Protective Equipment (PPE) and ensure they understand how and when it needs to be applied.

- *Emergency Preparedness:*

Commitment to reducing professional risks and developing an emergency preparedness and response plan, commitment to providing adequate education and training to the staff responsible for managing emergencies and to periodically plan and carry out simulations of the scenarios envisaged in the emergency management plan .

- *Fire protection*

Commitment to keep the fire protection systems in perfect working order, in compliance with the authorizations received and current legislation.

- *Incident and Accident Management*

Commitment to implement hazard and risk analysis systems to minimize/minimise the potential for incidents or accidents at the workplace. An investigation system should drive to determine the root cause, and a corrective action system should ensure all permanent measures have been taken to minimize the chance of a recurrence.

- *Awareness and Involvement of Suppliers and Contractors*

Involve and make Suppliers aware of adopting behaviors that comply with the applicable health and safety regulations, this policy and the internal procedures to be applied for carrying out work on the company site. Coordinate procurement processes to identify hazards and evaluate and control risks arising from the contractor's activity that impact the workers of the Cogeme organization and those of the Cogeme organization that impact the contracting company's workers.

5) Responsible Supply Chain Management

The Cogeme organization select business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles listed above along the supply chain.

Cogeme organization is committed to implement a supplier management system that includes the following:

- *Due diligence*

To conduct due diligence on their direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promote transparency and traceability and use their best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.

- *Responsible Sourcing of Raw Materials and Minerals*

Responsibly source the raw materials used in its products, developing a management system that promotes traceability and transparency of the supply chain and implementing due diligence measures in accordance with the OSCE Guidelines on Due Diligence for a Responsible Supply Chain of minerals from conflict-affected and high-risk areas.

Patrica (Fr) – ITALY: 21 May 2024

The General Manager


