

Arcoprofil srl and Arcoprofil F&G srl (ARCOPROFIL hereinafter), aware that a supplier of reference in the Automotive (and non-Automotive) sector fully implements state-of-the-art sustainability principles, have embarked on their journey in this direction. This decision, based on a deep conviction of values, meets the specific objectives of

- meeting the requirements of major Customers (see sector-specific standards, e.g., NQC SAQ 5.0, Ecovadis)
- positioning themselves as a Supplier of excellence to them and to their market

Sustainability includes, among the others, specific Health & Safety and Environmental contents; those contents are treated in this Sustainability Policy. Consequently, the QHSE Policy (on Quality, Health & Safety and Environment – see POL\_02) is to consider as complementary to this one.

Consistently with the above, within the scope of their activities:

- **BUSINESS ETHICS**

ARCOPROFIL is constantly and actively committed to supporting proper business conduct, in accordance with local laws, in their business as well as in their Supply Chain:

- by drafting and explaining its Code of Ethics to all personnel; the aim is to create corporate awareness of it and obtain compliance with it.
- by adopting an Organisational Model (MOG) based on Legislative Decree (DLgs) 231/2001, always updated in accordance with regulatory developments in order to ensure its effective application.

ARCOPROFIL:

- discourages and do not accept corruption, extortion and bribery, i.e. any abuse of power in office and any liability for illicit personal advantage, whether financial or not
- upholds and ensure privacy, guaranteeing an individual's right to decide who may process their data and for what purpose. ARCOPROFIL is committed to processing employees' personal data according to the requirements of applicable laws and regulations (see GDPR EU Directive 679/2016, and Decree 101/18 of 10 August 2018)
- follows the principles of financial responsibility, recording, maintaining activities and preparing reports on their financial activities, with accuracy and transparency.
  - discourages the disclosure of information, publicly discouraging information about their workforce, health and safety and environmental practices, Business activities, financial situation and performance: Employees must comply with the strictest standards on the confidentiality of data and information, of which they become aware during their working relationship (see Civil Code and Criminal Code).
  - ensures fair competition and anti-trust, including, but not limited to, avoiding business practices that illegally restrict competition.

- discourages and does not accept Conflict of Interest, and any situation in which an employee has an interest or loyalties that conflict with the interests of ARCOPROFIL shall not be tolerated.
  - does not agree to deal with counterfeit products, prohibiting the preparation and use of unauthorized copies, imitations, substitutions, or modified products that do not come from the original manufacturer or an authorized one
  - respects intellectual property, carefully considering intangible property resulting from creativity and protected by patent, copyright and trademark law
  - is aware of export controls and economic sanctions relevant to business and complies with them by satisfying restrictions on the export or re-export of goods and technologies, including those specific to certain countries, regions, entities, individuals or communities.
  - encourages and promotes Whistleblowing, i.e. the ability and willingness to report unethical or illegal business activities to specific recipients identified. All internal personnel and all key Stakeholder may do so confidentially and without fear of retaliation
  - discourages and does not accept Retaliation, so direct or indirect harm to anyone who raises a complaint or makes a report is not tolerated. Complaints and reports are to be raised anonymously and confidentially, and without risk of retaliation.
- HUMAN RIGHTS  
ARCOPROFIL is constantly and actively committed to treating employees and, in a broader sense, stakeholders, with dignity, fairness and respect, acting consistently, respecting, and protecting Human Rights through compliance with international laws and guidelines. In particular:
    - does not allow child labour, for children who are below the minimum working age required by Italian and local laws.
    - protects young workers (up to 18 years of age) from working conditions that are hazardous to their health and safety, or to their development.
    - with regard to remuneration and benefits, complies with contractual agreements with employees, in terms of remuneration and any entitlements due, according to the relevant Collective National reference scheme
    - carefully manages recruitment and careers, based:
      - for the former on laws and regulations in force, and on criteria that contemplate the clarity of the required profile, and its respect by the successful candidate; it implies the communication of this information in writing at the beginning of the path, together with own rights and duties (Company Rules), in the language understandable by the candidate. No unethical and delinquent actions are allowed in any way, such as the fraudulent lack of clarity regarding the position to be filled, or the requisitioning of Identity Card or passport, for purposes of blackmail and implicit slavery

- for the latter on regular evaluation and training, with the aim of ensuring continuous alignment with the needs of the profile and identifying any potential for growth and career
- does not exceed the number of working hours established by Italian and local laws. In case of any urgency or need, overtime and extra efforts are compensated by rest periods, in accordance with the aforementioned laws.
- forcefully bans and prohibits modern slavery and forced or compulsory labor.
- ensures workers and employees in general the freedom to join or form trade unions and authorize them to freely conduct activities in this regard, without any interference from top management
- considers harassment, which makes people feel intimidated or humiliated, as well as any other form of discrimination, as undesirable behavior and therefore prohibited. ARCOPROFIL makes every effort to ensure the lack of discrimination and equal treatment of individuals and groups, regardless of their characteristics, including sex, race, color, social or ethnic origins, genetic traits, language, religion or belief, political or other opinions, membership in national minorities, wealth, birth, disability, age or sexual orientation
- Develops and promotes an inclusion culture, where the Diversity is celebrated and valued and all may give their full contribution and fully express their potential. In addition, ARCOPROFIL encourages the Diversity at all levels, both within the workforce and leaders, including the board of directors
- Fully respects the Women's Human Rights, committing to favor their employment opportunities, even through specific projects, and to align their salaries to the male colleagues' ones for the same job. That is in line with the document "Convention on the elimination of all forms of discrimination against women" in whose spirit it fully believes
- fully respects and ensures external stakeholder Human Rights, such as the right to buildings and lands property, to the self-determination and to safety/security; in particular, ARCOPROFIL is committed to not proceed with any land, forest and water forced eviction or deprivation during their acquisition, developments or other use
- Recognizes the rights of Indigenous peoples, a fortiori if they are vulnerable groups:
  - to life conditions, education, employments and social activities fully decent
  - to the FPIC (Free, Priority and Informed Consent) on developments and plans that directly concern them or that concern the lands where they liveeven if, at moment, its activities have no impact on them, and commits to act in line with those principles when should the situation require it
- With the goal to protect its plants, buildings and projects, uses a private security force to which it is contractually requested the commitment to no human rights violations through the undue use of force, and on which operates the needed controls

- RESPONSIBLE SOURCING

ARCOPROFIL is constantly and actively committed to sustainable and ethical procurement, especially regarding raw materials and 'conflict minerals'. Therefore, in particular:

- when choosing a supplier, includes in the selection process criteria such as its working conditions, Human Rights policies, the way how it considers ethical matters as well as Environmental impacts (in addition to what showed by the QHSE Policy – see POL\_02)
- during the negotiation, makes it known to the Supplier that it is expected it complies with all national laws and regulations, including labor and environmental ones; the reference is this Sustainability Policy and the QHSE Policy
- by integrating Responsible Purchasing into their procurement practices, cares about the Supplier's ability to meet social and environmental standards, and therefore avoids as much as possible any inefficient practices, i.e. rush orders, last minute changes or placing orders that exceed the Supplier's capacity, which often leads to excessive overtime and violation of other laws
- encourages Suppliers to develop their own responsible practices within their supply chain; therefore, tracks the Supplier's compliance with responsible practices by asking them to provide comprehensive information: self-assessments are requested.
- require its employees to develop production programs for Suppliers that are in line with the above principles

- HEALTH & SAFETY AND ENVIRONMENT

In addition to what stated already into the QHSE Policy (on Quality, Health & Safety and Environment – see POL\_02), ARCOPROFIL is constantly and actively committed in particular:

- to avoid the increase of Greenhouse gases emissions, that trap heat in the atmosphere and contribute to global warming
- to care of Water quality and consumption, since it impacts on the access to clean water and the conservation for future generations.
- to care of Air quality, since the air pollution impacts on the health of current and future generations
- to support the Sustainable resource management, by optimizing their use, with the goal to minimize waste and preserve them for future generations
- to optimize the energy consumption and to increase the exploitation of renewable resources (see photovoltaic)
- to Decarbonization, that is to minimize to zero the emissions of GHG from its value chain
- to actively promote the Reuse, that is to use multiple times materials and objects, so that waste production is reduced, as well as the Recycle, through which objects and products are transformed into raw materials to reuse
- to ensure the Animal Welfare, that is to respect their right to the health, to comfort, to a correct and sufficient feeding, to the safety, allowing them to

express their genuine behaviors and preventing any unnecessary pain, fear and stress

- to sustain Biodiversity, to ensure a correct Soil Use and to ban the Deforestation, thus guaranteeing ecosystems where flora and wildlife are protected and any unrepairable damage to the natural habitat is prevented
- to guarantee the Soil Quality, that is to implement suitable actions, when necessary, with the goal to improve the Environment and the human health
- to minimize the external Noise emissions in the environment, acting on their sources (transports, industrial and general activities)
- to adopt a responsible chemicals management, by taking into account their life cycle, including handling, storage and disposal; in particular, to care of their handling, by providing guidance on how to act without harm to health and safety
- to provide adequate Personal protective equipment (PPE) for corporate duties, since they are aimed to protect against residual hazards in the workplace.
- to Emergency Management preparedness, since it is vital for the Group; then plans are in place to promptly respond to it, and specific Teams are trained to lead and support in the event of Emergency
- to care of Fire protection systems, since it plays an important role in keeping building occupants, assets, and the building it-self safe. This includes fire extinguishers, fire blankets, fire alarms and evacuation plans
- to care of workplace ergonomics by ensuring the workplace fits to its employee needs; this includes desk height, chair height, manual handling and heavy lifting. Workplace ergonomics lead to reduce discomfort and increase efficiency

ARCOPROFIL implements the above in the spirit of continuous improvement, a key element in achieving a level of excellence and the basis of their management principle, and:

- ensures that this SUSTAINABILITY POLICY is known by all employees, so as to make them continuously aware of the Company guidelines and objectives; this implies specific training and communication
- ensures the availability of the RESOURCES AND INFORMATION needed to support the functioning and improvement of the Company processes in a Sustainability perspective

**Sustainability policy**

2023, 20th of April

POL\_01 2023

The Sustainability Objective that ARCOPROFIL has set are included into the document POL\_01 OBIETTIVI

We invite all personnel working within our organization to consider this SUSTAINABILITY POLICY as a binding directive and to adhere to it in full, in the spirit of participation and sharing that we expect and that is essential for the health and strengthening of our business.

Santorso, 20<sup>th</sup> of April 2023

The managing director, Mrs. Valeria Zenare

Data-Rev Date-Rev	Descrizione Description	Preparata da Prepared by	Controllata da Checked by	Approvata da Approved by
23 Gen 2023 23 Jan 2023 Rev.00	Prima emissione, in accordo agli standard NQC SAQ 4.0 e Ecovadis First issue according to NQC SAQ 4.0 and Ecovadis standards	Team Sostenibilità Sustainability Team	R.- G. Casolin	V.Zenare – AD V.Zenare - MD
20 Apr 2023 Rev.01	Allineamento allo standard NQC SAQ 5.0 (modifiche evidenziate con doppia sottolineatura) Alignment to NQC SAQ 5.0 standard (changes highlighted through double underlining)	Team Sostenibilità Sustainability Team	R.- G. Casolin	V.Zenare – AD V.Zenare - MD