

TUBOSIDER SpA is an Italian company founded in 1965, a protagonist for over fifty years in the world market of civil works to protect man and the environment. The company operates through a manufacturing plant and its products are sold in over 110 countries grouped across Europe, America, Asia, Africa and Oceania. Aware of not being an entity in itself but of living in an increasingly demanding economic and social fabric, it has adopted and made operational a Management System for Quality, for the Environment, for Health and Safety, for Road, for the Prevention of Corruption, for Gender Equality and for Social Responsibility, in compliance with the standards UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI EN ISO 39001, UNI EN ISO 37001, UNI PdR 125 and SA8000.

TUBOSIDER SpA therefore undertakes to respect the rules of work ethics and rejects all working conditions characterized by inhumanity, exploitation, discrimination and unhealthy conditions.

With this Policy, the Management communicates inside and outside the company that it intends to operate with efficient and transparent methods to guarantee the continuous improvement of a socially, ethically and economically sustainable company Management System.

In application of this commitment, the company has determined that the Policy is aimed at pursuing the following general objectives:

- The satisfaction of the Customer and other Interested Parties (employees, collaborators, suppliers, users of the service, social context, etc.)
- The maintenance over time of a Management System compliant with the UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI EN ISO 39001, UNI EN ISO 37001, UNI PdR 125 and SA8000 standards, and its continuous improvement in line with the indications of the Interested Parties, with the legislative and regulatory developments and, more generally, in step with the transformations of the social, cultural and economic context in which the company operates
- Compliance with the applicable national and international legislative requirements, the commitments signed by the company with the Interested Parties, the standards taken as reference
- The dissemination of knowledge relating to the reference standards to encourage internal participation
- Increasing levels of competitiveness on the market and maintaining a high level of reliability and quality of the services provided, in full compliance with legal, health and safety, ethical, environmental and quality requirements
- Communication of the policy to all staff and its dissemination to other interested parties
- The diffusion of an effective communication system
- The optimization of corporate human resources management
- The continuous analysis and evaluation of the indications deriving from the Interested Parties, as a basis for an open and constructive dialogue for the identification of projects and objectives of mutual satisfaction
- The continuous analysis and evaluation of risks and opportunities deriving from the requirements of the Interested Parties and from the factors of the Internal and External Context
- The continuous improvement of the company's integrated management system
- The preference for suppliers capable of offering products and services that are more compatible with the principles of the company's integrated management system and the standards to which it refers
- Promote collaboration and full involvement of company functions in achieving objectives and increasing staff skills

-
- The commitment to the involvement and continuous consultation of workers, including through their representative

ISO 9001

-
- Consider customer satisfaction as a priority, aiming to improve the requirements expressed by customers and clients and to fully comply with the requirements expressed by current legislation, both national and international
 - Prevent defects
 - Consider suppliers as your partners, involving them in continuous company improvement
 - Promote the development and diffusion of Tubosider SpA products in Italy and abroad through licensing partners
 - Increase the contribution margin and reduce management costs

Pursue, both internally and within its supply chain, compliance with the following requirements and commitments:

SA8000

- Child and child labor: refusal of the use of child/child labor in the company production cycle, with verification of the worker's age during hiring
 - Forced or Compulsory Labor: refusal of the use of forced or compulsory labor and prohibition on the employment of personnel against one's will and on the use of any form of work under threat or coercion; prohibition on charging commissions or costs relating to hiring, to be paid in whole or in part by workers
 - Health and Safety: timely compliance with all mandatory obligations regarding health and safety in the workplace (e.g. worker training, risk assessment and management, etc.) and related management in compliance with specific company procedures. All staff have the right to leave work in case of imminent and serious danger, without having to ask permission from the company and/or the customer
 - Freedom of association and right to collective bargaining: respect for the right of all personnel to form, organize or participate in trade unions of their choice and to bargain collectively with the company, without this leading to any negative consequences or causing retaliation; compliance with all obligations set out in the category CCNL or sector agreements
 - Discrimination: the company does not use or support any form of discrimination in hiring, remuneration, 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, social affiliation, political opinions, age or any other condition that could give rise to discrimination. Sexual, threatening and exploitative behavior, gestures, language or physical contact are prohibited
 - Disciplinary Practices: the company does not implement or encourage the practice of corporal punishment, mental or physical coercion and verbal abuse
 - Working hours: compliance with rest days and weekly work limits, overtime limits and all other legal requirements and the applicable category collective bargaining agreement
 - Salary: The company guarantees that salaries comply with the employment contract, current legislation and what is established by the category CCNL or sector agreements. The payment of the same will be made on a monthly basis and in a convenient manner for the worker.
-

ISO 14001

- Define environmental programs aimed at reducing significant environmental impacts
- Prevent environmental pollution
- Improve workers' reaction to environmental emergencies
- Optimize the use of energy resources, avoiding waste and using the best technologies available

ISO 45001

- Constant commitment to identifying dangers, evaluating and controlling risks associated with company activities with a consequent reduction in accidents and work-related illnesses as well as reducing risks to a tolerable limit
- Protection of workers' health and safety
- Commitment to providing correct information on safety and the environment to all those who in various capacities are stationed, even occasionally, in the work area or on the construction site
- Ensure the distribution, control and use of personal protective equipment; the dissemination of corporate environmental standards and behaviors and that these have been understood
- Guarantee a reduction in accidents and illnesses through the constant application of the prevention and protection system integrated with the company 45001 system

ISO 37001

- The company adopts a firm and absolutely prohibitive approach towards any form of corruption
- The company intends to prosecute any corrupt behavior, requires compliance with the law and undertakes to adopt and enforce the management system for the prevention of corruption, also with the aim of increasing the awareness of all interested parties on the rules and behaviors that must be observed
- The company aims to base its operations, behaviors and way of working both in internal relationships and in relationships with external parties with correctness, equity, integrity, loyalty and professional rigor, placing full compliance with the law as well as compliance with company procedures
- The company requires that staff, in carrying out their activities, comply with principles of transparency, clarity, correctness, integrity and fairness
- The company prohibits, in business relationships, behaviors and practices that may even appear illegal or collusive, payments that may appear illicit, favouritism, solicitations, direct or indirect, for personal and career advantages for oneself, or for others
- The company is committed to continuously improving its management system for the prevention of corruption
- The company encourages reports of alleged corruption phenomena through a "whistleblowing" procedure which aims to guarantee the confidentiality of the content of the reports, the identity of the reporter and the person reported and to protect the reporter from possible discrimination or retaliation
- Tubosider SpA requires its "business partners" to comply with the laws in force, the ethical codes of the companies and this policy, on the basis of clauses whose non-observance implies the termination of the contract

ISO 39001

- Consider road accident prevention activities as a priority during business trips or home-work transfers of your employees
- Promote the full implementation of road accident prevention and protection measures, through the involvement and awareness of freight transport companies and partner companies
- Contribute to the passive safety of the road and motorway road network by designing, creating and installing road safety barriers capable of reducing the severity of the effects of collisions on people
- Promote and verify compliance with the requirements expressed by the reference standard
- Promote the attitude towards correct behavior in road traffic, preventing and discouraging risky behaviour

UNI PdR 125

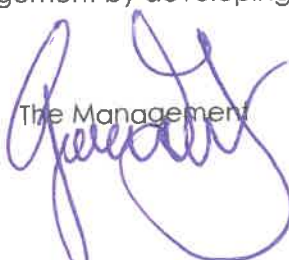
- Cultivate an inclusive environment by acting on the internal culture, with training, information, awareness-raising and engagement of managers and staff on the issues of equal opportunities and female empowerment, as well as diversity management;
- Create a meritocratic culture based on the evidence of the results achieved and far from any consideration linked to the gender, nationality or age of the resources;
- Create and maintain an environment in which each resource has the serenity necessary for their professional and personal growth in a highly inclusive context free of discrimination of any kind;
- Demonstrate the commitment to gender equality with awareness-raising actions aimed at stakeholders, suppliers and external collaborators, to reiterate the importance of pursuing one's personal aptitudes and inclinations, without giving in to conditioning and prejudices based on gender, with the aim to have an increase in its value network and be a point of reference for other companies;
- Manage all phases of the staff life cycle - selection, onboarding, access to training and growth paths, including remuneration - encouraging the principle of equal opportunities and meritocracy;
- Ensure the implementation of a zero tolerance policy towards violence and harassment in the workplace;
- Report and monitor possible misalignments through appropriate systems, in order to identify and correct them.

ANY CONDUCT THAT OPENLY VIOLATES THE COMPANY OBJECTIVES EXPRESSED IN THE COMPANY POLICY MAY BE PROSECUTED ACCORDING TO THE SANCTION SYSTEM DEFINED IN THE CCNL AND IN THE CODE OF CONDUCT.

All company staff and other interested parties have the opportunity to contact the company to make reports if they notice situations that do not comply with company policy or in any case corrupt episodes and behaviors detrimental to workers' rights by sending reports as per the operational indications available in the company intranet and on the website, in the section <https://www.tubosider.it/segnalazioni/>

The effectiveness over time of the Company Management Systems and the adequacy of this Policy for Quality, the Environment, Health and Safety, the Prevention of Corruption, Gender Equality, Road Safety and Social Responsibility, is evaluated by Management by developing periodic Management Reviews.

Monticello d'Alba, 20/10/2023

The Management


The Integrated Management
System Manager
