

## INTEGRATED CORPORATE POLICY

DG Impianti Industriali S.p.A. is a multidisciplinary engineering company and management mainly operating in managing design orders, environmental and safety consultancy and construction of industrial plants in Italy and abroad in the Power, Oil and Gas, Petrochemical, Pharmaceutical and Steel sectors.

To address the current energy transition at a global level, DG Impianti has recently launched a program of commitment to the diversification of sectors and business areas. Investments have been made in resources and technological innovation to provide services in the renewable and civil energy industry, while ensuring continuity and growth in the historic Oil & Gas sector, based on a cultural heritage and experiences deriving from over 50 years of activity and a management that is guided by firm values:

- **Ethics.** Integrity without compromise, honesty and fairness are at the heart of our business.
- **Excellence.** We set high standards. We apply advanced technologies and continually seek innovation and improvement. Our success comes from achieving challenging objectives
- **Fair Return.** Our profits/income fairly compensate for the value we deliver.
- **Safety.** Our mandatory goal is Zero accidents, People's health and safety depend on it.
- **Sustainability.** We are planning and working for the future, creating a long-term vision for our business, our customers and our world.

To pursue our goals, DG Impianti Industriali has decided to adopt an Integrated Management System that includes significant aspects of all management systems currently in place, based on the rules UNI EN ISO 9001, UNI EN ISO 14001, ISO 45001.

The Corporate leadership of DG Impianti Industriali manages the various business areas, committing to strengthening the company and creating shareholder value by improving its performance and the development of new initiatives with particular attention to sustainable development. New commercial plans, aimed at different sectors and new customers, are implemented and monitored, focusing on the area of technological innovation, with a view to increasing the profit margin, and they are developed with policies aimed at rationalizing purchases and monitoring our subcontractors.

Generally, with reference to the general and specific principles contained in this document, we underline that the subsidiary companies independently adapt the aforesaid Policy to their size and organizational and operational context, as well as to specific applicable regulations (for example in the financial and insurance sector).

The Policy is evaluated at least once a year during the Review of the Integrated Management System, based on the results obtained and its effective implementation; in the event of any changes, it is submitted to be approved by the Board of Directors and disseminated to all staff.

### PREVENTION OF CORRUPTION

DG Impianti is committed to carry out its activities, according to the following general principles:

- Guaranteeing a behavior based on the criteria of honesty, loyalty and moral integrity against corruption;
- Following all anti-corruption laws, rules and regulations;
- Carrying out its activities as not to commit any act of corruption in any form, both direct and indirect, and not to facilitate or risk getting involved in illicit activities, with both public and private entities.

DG Impianti Industriali S.p.A. and subsidiary companies must comply with the provisions in the Code of Ethics, in the procedures and protocols defined for complying with the reference regulatory framework on anti-corruption matters, as well as specific defined behavioral principles, including those provided for in the Organisation, Management and Control Model, pursuant to Legislative Decree no. 231/2001.

### CORPORATE RESPECT FOR HUMAN RIGHTS AND CORPORATE RESPONSIBILITY

DG Impianti protects workers and it expressly prohibits child labor, forced or compulsory labour, human trafficking and all forms of discrimination, also complying with the current regulations on safety and hygiene in the workplace, with the right of association and collective bargaining, with the disciplinary procedures provided for by the National Collective Bargaining Agreement (CCNL), and it applies and guarantees remuneration and working hours that comply with current regulations and the National Collective Bargaining Agreement (CCNL).

Human resource management is aimed at developing staff skills, by encouraging their engagement, by promoting awareness of the role and by ensuring full profile compliance with the tasks envisaged. DG Impianti has reorganized its staff with the long-term goal of adding value to human capital and to already existing skills, providing ongoing training, defining partnerships with Universities and research Institutes and assigning defined tasks and responsibilities to its staff to give everyone the opportunity to do their job to the best of their ability and to work in a team. DG Impianti Industriali is committed to ensuring compliance with cultural, economic and social rights by recruiting local workers and other social activities, in order to ensure a positive impact on local communities coming from projects both in Italy and abroad.

DG Impianti is committed to creating a healthy and productive work environment and for this reason it strictly prohibits the possession, use, distribution and sale of alcohol and illegal drugs in the company's premises and at the construction sites where it operates, as well as raising staff awareness against the consumption of tobacco and electronic cigarettes.

### DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES

DG Impianti firmly believes in a world where differences are a strength and may be a starting point for innovation and to contribute to a better tomorrow. DG Impianti is committed to creating a workplace with equal opportunities, including diversity in terms of races, nationalities, ethnicities, gender, age, physical abilities, sexual orientation and creating a workforce that reflects our diverse society.

Our customer care, on which all business processes are based, is highlighted in identifying and defining the Customer/Purchaser's requirements and in transforming them into project characteristics, monitoring activities of Customer satisfaction and the feedback received from Him/Her has always been considered of the utmost importance for the Integrated Management System.

By implementing and improving the Integrated Management System, DG Impianti Industriali believes that the most demanding customers can be satisfied by anticipating their needs and by obtaining their trust, so they can feel as an integral part of their success.

## SAFETY

DG Impianti manages its activities as connected processes that operate in a coherent system; communication methods are implemented and monitored inside and outside the company with particular attention to building lasting relationships with customers and suppliers.

Some of the main objectives are as follows:

- Prevent **injuries** to people and damage to systems and equipment
- Prevent **dangerous events** using all Customer requirements and complying with local regulatory requirements.
- Identify items with **potential impact** on health and safety in projects and operations, by planning and engineering them to avoid and/or mitigate their effects.
- Encourage **cooperation** between management, employees, suppliers and subcontractor personnel in promoting HSE in all workplaces

The General Management defines and reviews specific objectives that are consistent with the strategic vision, the QHSE objectives, as well as the allocation of resources.

The main strategies of DG Impianti are described by the following mottos:

- "Nobody gets hurt"
- "Quality is safety, safety is quality"
- "A Project, a Team"
- "Stop Work Policy"

Our success in safety and accident prevention is the result of a shared commitment for security from top to bottom and from bottom to top!

## ENVIRONMENTAL IMPACT

DG Impianti promotes actions to prevent, reduce and eliminate environmental impacts that are generated by its activities (by taking measures aimed at preventing air and water pollution, improving waste management and combating climate change) and risks to health and safety in the workplace.

Environmental issues are already raised at the preliminary stage of orders, to then take this into account during the design phase. If a health or environment risk resulting from a certain choice is identified, but there is insufficient scientific evidence to demonstrate its presence or absence, the precautionary principle is adopted.

DG Impianti wants to make its contribution to sustainable growth, by promoting a low-carbon economy, making more efficient use of resources and taking advantage of the synergetic opportunities between decarbonisation and the circular economy.

DG Impianti has decided to be committed to reducing climate change gas emissions (GHG) per person in its operational activities. For this purpose, some performance indicators have been set to monitor the results of its efforts in combating climate change, for example GHG emissions deriving from company vehicles, the use of renewable energy, consumption of gas, fuel and electricity.

The medium and long-term objectives for resource efficiency and reduction of GHG emissions are being set; we are planning to drastically reduce our carbon footprint.

The reduction target shall be achieved first by offsetting emissions that cannot be reduced; then we will try to develop a strategy to achieve minimum emissions exclusively with internal measures (without compensation).

DG Impianti is choosing, to the extent possible, products and services with low environmental impact: the technical specifications contain environmental requirements and award criteria, for example, are set in the order assignment process based on sustainability performance.

DG Impianti takes up the challenge of "Doing more with less" to address the global shortage of natural resources, the growing demand for energy and climate change by developing initiatives in favor of sustainable consumption: circular economy processes have been encouraged and we are fighting the indiscriminate use of plastic.

Our objective is a society where sustainable goods, services and business models are the norm.

All personnel of DG Impianti Industriali and suppliers shall have to apply what is defined in the policy and by procedures of the Integrated Management System. Every employee is required to have a full commitment to working safely and in full compliance with our management system.

The objective at this stage is to begin refining responsibilities and, therefore, carrying on with real responsibilities in our Management System HSE-Q.

DG Impianti is encouraging all company resources to make their contribution and suggest proposals for improving our safety management system.

DG Impianti promotes the development of environmental-friendly engineering activities which are oriented towards the rational and sustainable use of water resources, promoting measures aimed at protecting water resources, improving the efficiency of hydro-mechanical systems and reducing consumption and emissions.

Date and signature

28<sup>th</sup> February 2023

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