



The Management of **BERTOLA S.r.l.**, a leading company in the field of galvanic treatments, specifically copper plating, nickel plating, and chrome plating, recognizes the need to establish and maintain:

- A Quality Management System in compliance with ISO 9001 and IATF 16949 standards, specific to the Automotive sector;
- An Environmental protection Management System applicable to all activities carried out, in compliance with ISO 14001;
- A Health and Safety Management System to safeguard people and the working environment, in accordance with ISO 45001, based on the principles laid out in Ministerial Decree 09/08/2000, which states that the safe operation of an installation depends on comprehensive management criteria;
- A Social Responsibility System, supported by an internal Code of Ethics, considered a significant factor for the company's image, reputation, and economic risk.

The established management system integrates the tools of business management in Quality, Environment, Health and Safety at Work, and Social Responsibility, aiming to create increasing added value in all related activities and processes. With the implementation, maintenance, and improvement of the previously mentioned Management System, Management is committed to developing the following general guidelines, aligned with the analysis of the company's operational context, in order to identify opportunities for improvement within its business processes:

- Ensure that client's requirements and applicable regulations (standards and legislation of sectors and products) are known, identified, defined, and respected in order to increase customer satisfaction and regulatory compliance;
- Ensure that the expectations and requirements of relevant stakeholders who may influence the Management System's results are met;
- Provide processing services that exceed market standards in terms of corrosion resistance and brightness, offering timely service via automated systems managed by specialized and customized software;
- Develop innovative finishes in partnership with customers and multiple galvanic sector collaborators;
- Diversify business products and application sectors to mitigate market/competition risks;
- Protect the environment through the management system's environmental procedures, aiming to prevent, reduce, or eliminate pollution (especially regarding water, air, soil and subsoil quality, noise, and greenhouse gas emissions);
- Reduce and maintain already achieved levels of resource consumption (raw materials, energy, water), increasing the use of renewable energy sources and committing to energy efficiency aiming at reducing CO₂ emissions into the atmosphere;
- Adopt strategies to reduce climate change impact;



- Constantly pursue the prevention of negative environmental impacts through close control of environmental aspects that may be sources of such impacts;
- Ensure responsible management of chemicals, starting from their selection (compliance with requirements), through procurement (origin declaration of raw materials), continuing with storage, handling, usage (IMDS), and waste management;
- Manage water resources responsibly, ensuring compliance with national and international regulations as well as local regulations on the protection of surface water and groundwater, adopting techniques that minimize water use, aiming to reduce contamination of sources, and pursuing continuous improvement in water management practices;
- Increase the use of renewable energy sources (self-generated photovoltaic and geothermal, purchasing of 100% certified green electricity) and improve energy consumption aimed at reducing CO2 emissions into the atmosphere, committing to decarbonization;
- Even without a direct impact on animal welfare, minimize the risk of harming nature by avoiding activities contributing to illegal deforestation, poaching, or destruction of natural habitats that would result in biodiversity loss;
- Operate facilities to reduce negative impacts on employee health, safety, and well-being, as well as the print on the environment, minimizing the consequences of possible negative impacts through responsible management and sustainable development;
- Operate with respect for the safety of employees and nearby residents, preventing major accidents, injuries, and occupational illnesses, and mitigating any harmful effects;
- Provide Personal Protective Equipment (PPE) free of charge to workers, based on risk assessments for each role, ensuring PPE complies with current regulations;
- Ensure the safety of machines and work equipment:
 - in the purchasing phase by ensuring compliance with current regulations,
 - in the installation phase by assessing residual risks for users in the workplace,
 - in the usage phase by conducting periodic checks, scheduled and predictive maintenance;
- Promote workplace ergonomics by designing workstations that reduce the risk of repetitive motion, physical stress, and postural discomfort;
- Implement fire prevention measures, including monitoring and inspection of fire protection equipment to ensure accessibility and functionality, training emergency personnel, organizing periodic drills involving all employees, simulating emergency situations, all in accordance with applicable legal and regulatory requirements;



- Promote the circular economy through product certification such as "Infinitely recyclable" to ensure recyclability at the end of life; reuse of packaging where possible by returning it to suppliers or using empty raw material containers for liquid chemical waste;
- Organize and enhance human resources in terms of individual skills, defined autonomy, and availability, ensuring they are informed, trained, and equipped to operate with an understanding of potential risks associated with their tasks and operations;
- Strictly comply with all national and international export regulations, providing accurate and truthful information to customs and other authorities, aware of legal implications from violating international economic sanctions, ensuring all business transactions fully comply with applicable laws;
- Where significant, comply with national and international laws and regulations regarding land rights, forest and water use, ensuring that land acquisition, leasing, or use respects legal ownership, the rights of local communities, and local public authority land-use regulations, avoiding participation in any form of illegal forced eviction.
- Ensure that raw materials sourced from mining do not come from countries or territories under trade sanctions or that contribute to armed conflicts or are in regions at risk regarding workers' human rights;
- Commit adequate resources (including third parties) to implement the technical, organizational, and management interventions deemed necessary to achieve the improvement objectives, establishing measures to ensure behaviors consistent with the principles defined therein policy;
- Maintain and update procedures for continuous monitoring of compliance with labor contract regulations, personnel health, and safety;
- Guarantee a safe and secure working environment for all collaborators, clients, and suppliers, while respecting the fundamental rights of individuals, adopting preventive and defensive measures to minimize the need for intervention by public or private security forces in case of danger to personnel or facilities;
- Minimize privacy invasiveness, avoiding unnecessary or excessive surveillance, ensuring all security tools are used in compliance with data protection and individual rights laws.
- Develop a system for the continuous improvement of the Integrated Management System's effectiveness through periodic risk and opportunity assessments, applying "risk-based thinking" methodologies;
- Define and review company objectives at least annually:
 - Promoting the reduction of internal and external rejected parts, encouraging the reduction of variability and losses in the supply chain;
 - Reducing customer complaints, improving delivery and response times to them and, in general, increasing customer satisfaction;
 - Monitoring environmental indicators by selecting and developing new materials, processes, systems,



technologies, and raw materials to ensure services and products that comply with environmental regulations and minimize impact;

- Introducing monitoring procedures via periodic audits aimed at verifying the effectiveness and adequacy of emergency management measures;
- Committing to allocating human, instrumental, and economic resources for the development of Social Responsibility.
- Outline through a Corporate Code of Ethics, guidelines and conduct criteria regarding business ethics, employee management, labor rights, privacy and personal protection, and employee duties;
- Outline through a Supplier Code of Conduct, the expected behaviors of suppliers on human rights, workplace health and safety, and environmental protection, encouraging them to adopt and sign the code;
- Develop business strategies inspired by the principles of the Economy of Communion, an experience of solidarity economy with international significance.

To ensure the application and continuous improvement of the Management System, the Management of **BERTOLA S.r.l.** is committed to establishing the appropriate organizational and relational conditions within the company, giving equal priority to the management of quality, environment, safety and health at work, as well as socio-economic governance - within the limits of what is technically and economically feasible.

Furthermore, it commits to disseminating and ensuring understanding of this Policy to all personnel and relevant stakeholders, ensuring it is implemented and constantly maintained, and making it publicly available or available upon request through distribution on bulletin boards and the company website, along with improvement plans.

The requirements and implementation methods described in the Management System outline the Policy of **BERTOLA S.r.l.**, and as such, require full compliance from all personnel involved, within their respective competencies and responsibilities.



Chairman and CEO
LIVIO BERTOLA

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