

Integrated Policy for Quality, Environment, and Occupational Health and Safety

Spina Group S.r.l. prioritises the promotion of an integrated policy focused on stakeholders, especially that of customers — as well as the protection of the environment and the health and safety of its employees and all individuals involved in its activities or processes.

The adoption of such an integrated management system is a strategic decision for the company and represents a cornerstone for all organizational activities. It is aimed at continuous improvement of performance, which is periodically monitored and analyzed.

With this in mind, and in order to further promote an open and ongoing dialogue with stakeholders, Spina Group's top management has implemented an Integrated Management System in accordance with the International Standards UNI EN ISO 9001, UNI EN ISO 14001, and UNI ISO 45001, as a tool to:

- Maintain and continually improve the quality standards of the services provided;
- Use technologies that are both safe and environmentally sustainable, minimising risks and impacts, and promote continuous improvement in service delivery to customers;
- Ensure safe and healthy working conditions to prevent work-related injuries and illnesses;
- Protect information by adopting appropriate technical and organizational measures against unauthorized or unlawful processing, as well as accidental loss, destruction or damage, thereby safeguarding integrity and confidentiality;
- Reduce environmental impact by actively contributing to the transition toward a low-carbon economy;
- Adhere to the highest ethical, social, and governance standards—not only by complying with legal requirements in daily operations and promoting lawful behavior among stakeholders, but also by adopting international best practices in governance, communication, and risk management.

In implementing the Integrated Management System, Spina Group has analyzed its context, determined external and internal factors relevant to its goals and strategic direction, and defined specific objectives, including:

REF. ISO 9001:

- Satisfy shareholders/customers by delivering services in line with established quality standards;
- Comply with applicable laws and all other requirements, including voluntary commitments, relevant to the company's operations;
- Continuously monitor company objectives to ensure management efficiency and cost control;
- Consistently assess service quality to ensure performance levels and pursue continuous improvement based on stakeholder needs;
- Actively engage company personnel to achieve defined objectives through ongoing training, education, and information, measuring and verifying the fulfilment of requirements.

REF. ISO 45001:

- Avoid or minimise health and safety risks identified in the workplace while ensuring employee health protection and the integrity of the external environment;
- Take all necessary measures to prevent the accidental spread of risks outside company premises, during all phases of work activities;
- Comply with all applicable regulatory requirements and other subscribed obligations related to identified health and safety hazards;
- Promote a safety and health culture in the workplace by continually improving protection levels and risk prevention in all work activities.

REF. ISO 14001:

- Develop and implement an environmental management system aimed at reducing the impact of waste management activities, including packaging materials, used toner, paper, and plastic;
- Reduce the impact of non-recoverable waste from waste collection processes;
- Use natural resources (e.g., water, energy, raw materials) rationally and sustainably;
- Comply with all applicable environmental laws and regulations, as well as any other environmental commitments undertaken by the organisation;
- Continuously improve environmental performance;
- Prevent pollution.

Spina Group S.r.l. therefore aims to achieve the following objectives within the scope and scale of its operations:

a) Continuity and regularity of service

- Commit to performing services with the utmost diligence, professionalism, and integrity, in compliance with legal and quality standards;
- Ensure continuity and consistency of services through a structured organisation capable of executing planned actions and allocating adequate resources (personnel, equipment, and tools);
- Respond promptly to hazardous or problematic situations reported by competent authorities;
- Respond swiftly to customer complaints and take appropriate action to resolve critical issues.

b) Professional conduct of personnel

Spina Group personnel are expected to comply with health and safety regulations, respond to user needs, and facilitate the exercise of rights and fulfilment of obligations.

c) Impartiality and inclusiveness

Spina Group ensures that its directors, employees, and collaborators act with objectivity, fairness, and sensitivity toward all client organisations. The company promotes equal treatment and a work environment free from discrimination based on race, religion, gender, age, political opinions, or physical disabilities.

d) Fairness and transparency

Spina Group is committed to ensuring that its personnel act ethically, with dignity and respect. All activities must be carried out with dedication and fairness, in accordance with current regulations and internal procedures. The company also undertakes to operate transparently, without favouring any individual or interest group.

e) Staff development



Spina Group opposes all forms of discrimination based on race, gender, nationality, origin, religion, language, disability, political orientation, sexual orientation, or any other cultural or personal characteristic.

f) Provision and maintenance of appropriate tools and equipment

Spina Group undertakes to keep the tools and equipment available to personnel for service delivery up to date, safe, and in good working condition.

g) Access to appropriate workplaces

Spina Group commits to maintaining company buildings and spaces in a safe and functional condition for both internal personnel and external parties (suppliers or visitors).

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Management and/or the Integrated Management System Manager will ensure effective communication of this policy to stakeholders and all other interested parties through meetings, document posting in meeting areas, and publication on the company website.

San Giuliano Milanese, 31.03.2025

The General Management