

## Integrated Quality, Environment and Health and Safety Policy

Spina Group S.r.l. considers it a priority to promote an integrated policy focused on the satisfaction of its stakeholders and in particular the customer as well as the protection of the environment and the health and safety of its employees and all other people involved in its activities or processes.

The adoption of such integrated management represents a strategic decision on the part of the company and is considered a cornerstone for all the organization's activities. It is geared toward continuous improvement of its performance, which is periodically monitored and analyzed.

Precisely with this in mind, in order to further promote an open and constant dialogue with Stakeholders, the top management of Spina Group. has implemented an Integrated Management System according to the International Standards UNI EN ISO 9001 UNI EN ISO 14001 and UNI ISO 45001 as a tool for:

- Maintain and continue to improve the quality standards of services provided;
- Employing safe and clean technologies, i.e., with as little risk and environmental impact as possible, and promoting continuous improvement in service delivery to the Client;
- Ensure safe and healthy working conditions to prevent work-related injuries and illnesses;
- Safeguard and protect information by taking appropriate technical and organizational measures, from unauthorized or unlawful processing and accidental loss, destruction or damage (integrity and confidentiality), in order to enable the achievement of identified objectives.
- Reduce environmental impact by actively contributing to a transition to a *low-carbon* economy.
- Comply to the highest ethical-social and governance standards, not only by complying with regulations in our daily operations and promoting compliance with the law to our stakeholders, but also by adopting international best practices in governance structure, communication and risk management system.

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

### **REF. ISO 9001:**

- Satisfy its Members/Customers through service delivery while maintaining defined quality standards;
- Meet the requirements of current regulations in the subjects covered by the system and all requirements, including voluntary commitments, which are peculiar to business activity;
- Continuously monitor business objectives, ensuring management efficiency and reducing and/or Cost containment of services;
- Constantly monitor the quality of the services provided in order to ensure their performance level and pursue continuous improvement, according to the needs expressed by stakeholders;
- Actively and motivatedly involving the company's workforce in order to achieve the proposed objectives through ongoing training, education and information activities, measuring and verifying the satisfaction of requirements;

### **REF. ISO 45001:**

- Avoid or minimize Health and Safety risks assessed within the work areas under consideration, while respecting the health protection of its employees and the integrity of the external environment;
- Take all necessary measures to prevent the accidental spread of any hazards outside the company's work premises, for all phases of work activities;
- Comply with applicable regulatory obligations and other signed requirements related to identified health and safety hazards;
- Promote the culture for safety and health in work environments, further improving the levels of health safety and risk prevention in one's work activities.
- Promote consultation and participation of workers at all applicable levels and functions in the development, planning, implementation, performance evaluation and improvement actions of the OSH management system

**In addition, Spina Group is committed to the following performance on its services provided:**

Consultation: Involves workers without managerial functions in determining stakeholder needs and expectations, setting OSH policy, assigning roles, responsibilities and authorities, determining legal and other requirements, setting OSH goals and planning for their achievement, determining controls for procurement and contractors, determining what to monitor, measure and evaluate, and planning audit programs .

Participation: Involves workers without managerial functions in determining how to foster and make practicable consultation and participation, in identifying hazards and assessing risks and opportunities, in determining actions to eliminate or reduce risks, in determining skill requirements, in assessing training needs, in determining what training to conduct and evaluating the training conducted, in determining what to communicate and how to do it, in determining control measures and their effective implementation, and in investigating nonconformities and incidents and determining corrective actions.

**REF. ISO 14001:**

- Development and implementation of an environmental management system for the reduction of environmental impacts from the disposal processes of used packaging materials and toner, paper and plastic;
- Reducing the impact of any non-recoverable waste from waste collection operations;
- Rational and sustainable use of natural resources (e.g. water, energy and raw materials);
- compliance with all applicable laws and regulations as well as any other environmental requirements subscribed to by the organization;
- Continuous improvement of environmental performance;
- pollution prevention

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

In addition, Spina Group is committed to the following performance on its services provided:

**a) Continuity and regularity of service**

- Undertaking to carry out the activity for the provision of services with the utmost diligence, professionalism and correctness and in compliance with mandatory requirements and quantitative and qualitative standards;
- Committing to ensure the continuity and regularity of services, making use of an organizational structure that enables it to carry out regularly scheduled actions and from the provision of adequate resources (people, means and equipment);
- Committing to take prompt action to deal with any dangerous or special situations inconvenience of users, upon notification of the relevant authorities;
- Committing to promptly respond to user complaints and identify the most appropriate actions in resolving critical issues;

**b) Proper behavior of staff**

Spina personnel are required to work by observing health and safety regulations, to respond to their needs, to facilitate them in exercising their rights and fulfilling their obligations.

**c) Impartiality and inclusiveness**

Spina Group ensures that its directors, employees, and collaborators operate by behaving in a manner inspired by objectivity, impartiality, and care towards all organizations to which it provides its services. It is committed, with respect to its staff, to promoting fair treatment and fostering a work environment free of discrimination on the basis of race, religion, sex, age, political opinion and physical handicap.

**d) Fairness and transparency**

Spina Group is committed to ensuring that ethical behavior, marked by dignity and respect, is always exhibited by personnel.

As such, all activities must be carried out with commitment and fairness in accordance with current regulations and internal procedures.

It is also committed to operating in a clear and transparent manner, without favoring any interest group or individual

**e) Staff development**

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

**f) Use of appropriate tools and equipment**

Spina Group undertake to keep the tools and equipment available to staff for service delivery constantly up-to-date and in good condition for use and safety.

**g) Access to appropriate workplaces**

Spina Group is committed to keeping buildings and spaces usable by internal personnel in the performance of work activities and by external personnel (suppliers or visitors) in safe, good condition at all times.

Management and/or the Integrated Management System Manager will ensure effective communication of our policies to stakeholders and all other interested parties through meetings, posting documents in meeting areas, and posting on company website

San Giuliano Milanese, 03/31/2025

The General Management