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REVISION STATE AND HISTORY				
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03	28/02/2025	Monari L.	P. Iengo	Updated ISO certificate information. Added section for Diversity & Inclusion. Various other minor modifications.
02	20/10/2023	Monari L.	P. Iengo	Few clarifications regarding health, safety and environment.
01	31/12/2022	ComEx	P. Iengo	Minor formal changes and clarifications.
00	31/08/2022	ComEx	P. Iengo	Replaces previous doc. named “Quality Policy” (QLT-M-000), expanding its context to the various company policy themes.

SUMMARY

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1 INTRODUCTION

The present document outlines the company management policy of Ballestra S.p.A. (from now on, “Ballestra” or “the Company”), with the aim of communicating to the public:

- its basic settings and principles;
- its permanent objectives;
- the commitments it assumes in relation to all parties involved, in the full context of enterprise activities.

The present Policy sums up and harmonises the different “policies” that represent the foundations of the Company’s management and governance:

a. policy for quality;
b. policy for human rights;
c. policy for diversity, equity and inclusion;
d. policy for legality and compliance;
e. policy for health e safety;
f. policy for social and environmental sustainability.
g. policy for privacy and data security.

All these policies have wider and more precise detailing within other documents of the Company’s management systems, first of all the Code of Ethics, where the values and inspiring principles of Ballestra are expressed in a more precise and specific form.

Ballestra aims to create value within the market sectors where it operates, whether as a global leader or an emerging player. This is achieved thanks to its levels of ***effectiveness*** and ***efficiency*** that are constantly increasing, the optimisation of its management production processes, adherence to the needs of the market and of the context where it operates, satisfaction and loyalty incentivisation of its clients and its continuous technological and operational development and enhancement.

Coherently with said objective, the Company has been striving for years to pay increasingly more attention towards ***sustainability*** at all levels. On one hand the aim is to maximise financial profit, ensuring the acquisition and the execution of projects with suitable profitability and financial stability, in compliance with the objectives fixed by the shareholders, the legitimate interests of our clients, our employees and our suppliers. We do however also seek the satisfaction of all parties involved, directly or indirectly, in the chain of value creation, protecting and enhancing the reputation of the Company towards all its stakeholders, with the aim of making the success of the Company last longer while fostering its sustainable growth.

In particular the Company, in compliance and in conformity with its own specific market objectives, recognises the need to commit at all levels for the constant improvement of the aspects described in the following paragraphs.

2 BUSINESS, MARKET LEADERSHIP AND CUSTOMER ORIENTATION

The Company aims to consolidate and strengthen its leading or growing positions in the sectors in which it operates, maintaining and enhancing its own commercial, technological, operative and financial reputation, increasing the satisfaction of clients and partners and constantly seeking to offer products and services that are increasingly safer, more reliable and more competitive while keeping efficiency at the core of its operativity, with the objective of saving time and operative costs, errors, waste and reworkings.

To maintain a result-driven attitude, fulfilling our contractual obligations towards our clients, preserving their trust and reputation, that Ballestra can boast on the market, those are the core values for the consistency of our business, as well as permanent objectives for everyone.

It is also to this end that the Company pays close attention and invests great resources in Research and Development (R&D), turning it into a strategic service, involved not just in researching proprietary technologies and in the commercial and executive development of the licensed technologies, but also “at the forefront” in customer service.

Among the permanent objectives of Ballestra’s Research and Development, along with the technological improvement, the expanding and the optimisation of the products portfolio and the reduction of production and maintenance costs, we can find:

- reduction of the environmental impact of machines and plants;
- improvement of said machines and plants in terms of safety and prevention;
- improvement of the final product – destined to consumers markets – in terms of impact both on the health of consumers and on the environment.

3 HEALTH, SAFETY, PREVENTION

Ballestra actively pursues the objective of reducing injuries to ZERO, both in the context of work activities managed directly and of assembling, erecting, commissioning, testing and operating its plants and its machinery.

The Company believes that it is essential to provide to all its employees and co-operators a safe working environment and safe working conditions, regardless of whether the working activity is carried out in-house, away, or in flexi-working. It also believes that it is useful and only appropriate to commit to protecting the health, safety and wellbeing of individuals, but also so that every individual involved in the activities can grow professionally and express their potential to the best of their abilities, in a highly collaborative and lively environment, in compliance with the rights, the responsibilities and the duties of each party involved.

Equally, Ballestra is committed to ensuring complete safety and conformity of all its products and correlated processes.

To this end, along with the accurate and timely compliance with the Italian and local norms, the Company implements a Health & Safety Management System, certified ISO-45001 since 2024.

Within this context, the Company promotes and implements actions to ensure a proper consultation of all workers, as well as an improvement of their degree of participation. Particularly, workers are strongly encouraged to report any case of “near miss” that may occur in the working context.

4 ENVIRONMENTAL SUSTAINABILITY

The Company, certified ISO-14001 since 2024, is committed to pursuing higher and higher environmental sustainability, by preventing pollution at all levels, by optimizing waste management of all types and promoting the concept of circular economy, with the final aim to protect the environment and any involved counterpart.

More specifically, the Company is committed to oppose to the effects of climate change with initiatives aiming at the reduction and/or compensation of GreenHouse Gas emissions, joining the long-term target of "*net-zero*", as stated by the Paris Agreement.

The above introduced commitment finds an application in both direct activity organization and optimization, and reduction of environmental impact of plants and proprietary machinery, designed and supplied, so to involve the whole value chain, internal and external.

In such context, Research & Development activities take a particularly important role, being permanently oriented to the reduction of environmental impacts in the application of the different technologies making up its portfolio.

5 HUMAN RIGHT – LEGALITY – ETHICAL BEHAVIOUR

Within its policy of attention to human rights and – more specifically – to the rights related to Labour, Ballestra gets inspiration from the following sources:

I. United Nations Guiding Principles on Business and Human Rights, published in 2011;

II. International Standard ISO 26000, on which the Company's ESG Management System is based.

The Company has particularly adopted strategic objectives in line with ILO's (International Labour Organization), that is:

a. *Promote fundamental principles and rights at work and grant their application.*
b. *Grant, through the long-term success of its business activities, levels of employment and income in line with medium-high market standards.*
c. *Secure, compatible with other financial, organizational and managing constraints, a wide and fair social protection for all people.*
d. *Strengthen social dialogue within parties: communication, training and positive sharing of competence and experience.*

Moreover, Ballestra, having always operated in a global context, promotes the values of legality and stays alert about any possible threat to them. Particularly, procedures and monitoring have been established in order to prevent frauds, corruption, illegal and/or unfair practices, intellectual property violations, as well as any other action that might taint the Company's ethical vocation.

Such attention is also addressed to all third parties that cooperate with Ballestra, contributing to its business activity per different types of transactions and commercial practices. The Company is therefore committed to honour all its ***conformity obligations***, whether they are cogent, contractual, expressed or even just implicit.

In this context, the Company already adopted a few years ago a Management Model for the prevention of crimes as per D.L. 231 and it has integrated its own operative procedures in accordance with the guidelines of the International Standard ISO-26000. This includes activities aimed to verify the behaviour of its counterparties, to ensure a full compliance to international sanctions and other applicable regulations.

6 VALORISATION OF HUMAN CAPITAL

The success of the Company is based on the value and the commitment of its co-operators.

Ballestra intends to promote professional growth, satisfaction and motivation of its own co-operators, so that they can contribute to fulfilling the company's objectives, each from their own end, with loyalty, responsibility, initiative and in autonomy, within the scope and limits of the mandates received. To this goal, the Company encourages and sponsors various types of initiatives aimed at enhancing personnel welfare and grant an inclusive and rewarding work context.

Ballestra also encourages the sharing of operative experiences at all levels, as an indispensable tool for improvement and company cohesion.

Finally, the Company, according to its decades-long work in the most diverse geographical areas and in the most varied contexts, recognizes diversity both as an intrinsic value and as a tool for increasing productivity and the capacity for innovation. Therefore, consistent with current operational objectives, it pursues the inclusion and integration of human resources of different ages, nationalities, languages, cultures, abilities, and personal backgrounds, taking care to ensure equity at all levels. In particular, the Company aims to achieve perfect gender equity, progressively repairing the mistakes of the past.

The Company's management is constantly committed to ensuring the dissemination and sharing of established economic, market, and operational-management objectives, so that all its employees can work in harmony to achieve them.

7 INTEGRATED QUALITY AND MANAGEMENT OF SYSTEMS

The Company, certified ISO-9001 since 2001, understands Quality Management as an integrated system oriented towards "Total Quality". To this end, the Management System for Quality is implemented and improved not only with the aim or pursuing the usual objectives of continuous improvement, attention to clients, cooperation with suppliers and with all interested parties, but also to serve as model and basis for the harmonic development of all other management systems.

A specific internal Committee is in charge of continuously working on coordinating and harmonising work procedures, in compliance with the peculiarities of the various systems adopted and under adoption.

The different aspects of company management, as summarily described in the present document, supply an equal number of indications and measurements that help feeding the mechanism of "continuous improvement" and of "lessons learnt", in order to capitalise the executive know-how while improving the value of the Company. Furthermore, a coherent approach to methodologies of ***risk analysis and of opportunities*** acts as methodological basis for the various applications.

8 ICT ASSETS AND SECURITY

The Company has carried out, in recent years, a very high effort to modernise its equipment in the field of Information & Communication Technology.

Said effort continues, with the aim of maintaining constantly updated hardware and software equipment, competences and standards of safety and data-protection and the company know-how.

Cybersecurity is a constant focus and the subject of significant investment. To this end, the company is implementing an Information Security Management System compliant with the requirements of the international standard ISO-27001.

9 COMMUNICATION AND AWARENESS

The Company believes that efficient and effective internal and external communication is an essential tool to achieve durable success and the satisfaction of all parties involved and is committed to ensuring transparency and information for all collaborators and stakeholders.

Wide space is devoted to information, particularly in the welcome process for new employees.

Maintaining effective communication in every context must be a shared and ongoing goal for all company stakeholders, both in terms of refining and improving operational tools and from an organizational, procedural, and training perspective.

10 CONCLUSION

The policies expressed in this document are implemented through objectives, which are formulated and managed, year by year, based on the results of the annual Management Review and the five-year Business Plan.

All Company personnel (employees and collaborators) must be informed of the contents of this Management Policy and of the other related documents and must participate in corporate life by complying with the requirements, rules, and values expressed in the documentation of the various applicable Management Systems.

The contents of this document are shared appropriately with all stakeholders.