

Company Policies

Update of 18/03/2025



[VITALI]

SB
SOCIETÀ
BENEFIT

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A concrete
commitment

towards
sustainability

and the
common
good

"They envision a future in which all
companies compete to be not just the
best in the world, but the best for the world"

In 2024, Vitali S.p.A. SB embarked on a strategic path that is fundamental for its future, adopting the "Benefit Corporation" model. This important step stems from the awareness that today's social and environmental challenges require a profound change in traditional business models.

The choice to become a Benefit Corporation is not only a strategic decision, but a real corporate philosophy. Vitali has decided to combine the objectives of profit with those of common benefit, believing that only through an approach that reconciles economic performance and social and environmental impact can a better future be built for all. This new business model is based on the fundamental principles of transparency, accountability and sustainability.

For us, being a Benefit Corporation means having the responsibility to respond to the global challenges that characterize our time. We are committed to building a sustainable future, where future generations can live in a better, fairer and healthier world. In this perspective, every action of Vitali is designed to go beyond simple profit, trying to contribute in a meaningful way.

We are convinced that this path represents a valuable choice, not only for the company, but for the whole community. By joining the Benefit Company model, Vitali is committed to responding to the needs of the present, generating lasting and positive impacts, and preparing the ground for a future that can be sustainable and prosperous for all.



Company policies

Company policies are the fundamental principles that guide our daily actions

Vitali S.p.A. Società Benefit has developed a set of policies that act as a point of reference for all those who work in the company, ensuring consistency, integrity and responsibility in all company activities.

Our business areas are as follows:

Our business areas are as follows:

- REAL ESTATE DEVELOPMENT - FACILITY PROPERTY MANAGEMENT - URBAN REGENERATION;
- THE CONSTRUCTION OF OFFICE, COMMERCIAL AND LOGISTICS BUILDINGS;
- THE CONSTRUCTION OF TRANSPORT INFRASTRUCTURE;
- THE DEMOLITION OF INDUSTRIAL AND CIVIL BUILDINGS - ENVIRONMENTAL REMEDIATION;
- DESIGN/EXECUTION OF STEEL AND ALUMINUM STRUCTURES;
- THE PRODUCTION OF AGGREGATES, CONCRETES AND ASPHALTS;
- THE PRODUCTION OF RENEWABLE ENERGY.

The corporate policies of ****Vitali SpA Società Benefit**** are reflected in its commitment to excellence and sustainability, integrating guiding principles that aim at continuous improvement. Here is a summary of the main company policies adopted:

- QUALITY POLICY;
- ENVIRONMENTAL POLICY;
- OCCUPATIONAL HEALTH AND SAFETY POLICY;
- SOCIAL RESPONSIBILITY POLICY;
- SUSTAINABILITY POLICY;
- HUMAN RESOURCE MANAGEMENT POLICY – HUMAN RIGHTS;
- DIVERSITY POLICY - INCLUSION, GENDER EQUALITY;
- SUSTAINABLE PROCUREMENT POLICY;
- MANAGEMENT POLICY FOR ROAD SAFETY;
- CORRUPTION PREVENTION POLICY;
- ENERGY POLICY;
- INFORMATION SECURITY POLICY.

As part of the periodic review of the integrated system by the Management, specific objectives for the continuous improvement of the system are defined and distributed to all interested parties.

For each policy, the necessary implementation tools are defined, the performance is reported annually and, through a gap analysis between the current state and the objectives, targeted improvement plans are established.

The Company Management supports the achievement of objectives and promotes the active involvement and collaboration of all company collaborators, including external ones, in order to promote the growth and development of the company and the people who work there. Policies are reviewed annually during the Integrated Management System Review to ensure that they are always aligned with the company's mission and vision. The content of the policies is made available to all stakeholders, internal and external.

Quality Policy

Our mission is to guarantee excellence in a sustainable and innovative way, committing ourselves daily to carry out each project with the utmost attention to quality, safety and efficiency.

Our attitude is to perform every job "at state-of-the-art", starting from the beginning with a total commitment to continuous improvement. Vitali adopts a Quality Management System (QMS) compliant with international ISO 9001 standards, ensuring that all phases of construction are carried out effectively, safely and responsibly.

Our approach is oriented towards risk management and the adoption of best practices in the field of sustainability, with the aim of constantly improving business performance.

The Vitali company formally undertakes to respect and promote the following principles:

01.	To guarantee its commitment in terms of quality, innovation, excellence, sustainability and safety, both in the design of the work and in the execution of the works. We are determined to ensure the highest quality and innovation at every stage of the project, from design to execution, adopting innovative and sustainable solutions to optimize results.
02.	Adopt and comply with regulatory obligations, standards, technical specifications and best practices in the field of health and safety, protecting both staff and end customers, understood as users of the works in operation.
03	It is committed to exceeding the expectations of its customers and interested parties, carrying out the work in a workmanlike manner and according to the highest standards, ensuring transparent management and effective communication, with the aim of continuous improvement
04.	Implement an effective and efficient Quality Management System to achieve Quality objectives, periodically measuring its performance;
05.	Maintaining constant control of the entire production process, through detailed planning and the use of suitable tools to ensure compliance and quality, we are oriented towards an extended approach to "Risk Management" in order to anticipate and minimize the effects of technical and economic-financial risks and to exploit opportunities for improving competitiveness
06.	Investing in research and development, identifying innovative technologies to optimize the quality of products and processes
07.	Use appropriate and competent resources to develop, maintain and disseminate the culture of quality.
08.	Provide the infrastructure and financial resources necessary to achieve the objectives in terms of quality management.

Environmental policy

Environmental protection is a fundamental and essential priority for Vitali, which is committed to respecting the highest environmental standards in all its activities.

In its construction operations, Vitali adopts a Highly effective, adequate and suitable Environmental Management System, with the aim of constantly improving its performance and promoting environmental development.

The company takes a careful approach to risk management and the entire life cycle of its projects, always with a primary focus on the environment. This Policy represents a formal commitment by the Company Management to operate in full compliance with an Environmental Management System that meets the strict requirements of the ISO 14001 standard, ensuring a positive and lasting impact on the environment and society.

The Vitali company formally undertakes to respect and promote the following environmental principles:

01. requirements	Comply with all requirements related to compliance with all mandatory
02.	Guarantee adequate resources to ensure the effective implementation of the Environmental Management System;
03	Prevent air, noise, light and odor pollution, intervening on direct and indirect environmental aspects that can be controlled or influenced by our operations
04.	Mitigate negative impacts on surrounding communities by promoting sustainable practices that protect the environment, reduce pollution, and promote the conservation of natural resources
05.	Ensure full cooperation with local communities and regulatory bodies, ensuring transparency in information and setting up clear channels of communication to facilitate dialogue and collaboration
06.	Protect water resources and promote sustainable water use, both in terms of quality and quantity, from the withdrawal phase to the discharge of wastewater, adopting efficient solutions
07.	Reduce the consumption of natural resources and raw materials, focusing on a more efficient and sustainable use of available resources;
08.	Reduce waste production and optimize waste management by promoting reuse and recycling practices;
09.	Reduce energy consumption and promote the use of renewable energy, while also minimizing greenhouse gas emissions;

10.	Adopt the most appropriate technical and organizational measures for the protection and safeguarding of ecosystems and biodiversity, the protection of protected areas and endangered species;
11.	safely manage hazardous substances by minimizing their use;
12.	Limit the use of hazardous chemicals in production processes, adopting alternative solutions that are safer for human health and the environment;
13	Design works with the highest possible level of recyclability at the end of their life, favoring design for disassembly and the possibility of reusing materials in new production cycles;
14.	Ensure continuous training of workers, creating a positive and aware environmental culture, aimed at preventing potential negative impacts
15.	Employing innovative resources and technologies in production processes, to improve efficiency, reduce waste and encourage the adoption of sustainable solutions at every stage of the production cycle.



Health and Safety Policy

On the strength of our consolidated experience, Vitali stands out for always being one step ahead in safety management. The protection of Health and Safety is not only an obligation, but a fundamental commitment.

This Policy represents the formal commitment of the Company Management to comply with the principles of protection of Health and Safety in the workplace, in full compliance with the requirements of the ISO 45001 standard.

As part of its activities, Vitali adopts a Health and Safety management system that is not only suitable, but also adequate and effective, oriented towards the continuous improvement of company performance. Our approach focuses on risk management and sustainability development, aiming to create an increasingly safe working environment and prevent all forms of accidents, with a view to growth and growth.

We are committed to ensuring the health and safety of all our employees, internal and external, through the following actions:

Vitali requires its partners, suppliers and subcontractors to comply with the principles for the protection of health and safety in the workplace expressed in this policy.

01.	Comply with all requirements related to compliance with all mandatory requirements
02.	To ensure healthy working conditions and a safe working environment, i.e. maximum technical, organisational and procedural safety with regard to machines, plants and equipment.
03	Promote a culture of safety, always favoring preventive measures over protective measures
04.	Involve, consult and empower workers in risk assessment and management, making them active and responsible participants;
05.	Implement all measures that can minimize the likelihood of accidents, injuries and occupational diseases
06.	Use innovative technologies in production processes and employ qualified and adequately trained resources to eliminate hazards and reduce risks to the health and safety of workers;
07.	Ensure constant and timely health surveillance in agreement with the competent doctor;
08.	Ensure continuous training of workers, provide up-to-day information and detailed instructions, and supervise activities to promote a positive health and safety culture on Occupational Health and Safety;
09.	Carry out an in-depth analysis of production activities to identify risks and prevent possible events
10.	Involve and consult workers and, where established, Workers' Representatives, on Health and Safety issues, making them active participants;
11.	Use innovative technologies and production processes, with adequate and qualified resources

Social Responsibility Policies

Vitali confirms and strengthens its commitments already outlined in the Code of Ethics, in the Company Policies and in the Human Rights Guidelines, with the aim of achieving the highest ethical standards in its work

Corporate Social Responsibility (CSR) is a fundamental value for us that guides daily decisions and actions, orienting every process towards sustainability and respect for fundamental rights.

In particular, Vitali is committed to developing a socially responsible work environment, promoting the professional growth of all its employees. In this context, we respect and will comply with all local, national and international regulations, including those of the International Labour Organization (ILO), and we are committed to respecting human rights, as established by the United Nations.

Vitali's approach also extends to all its suppliers, who are part of the supply chain of products and services. It is our will that business partners also adopt ethical and social responsibility principles, ensuring that working conditions and human rights are respected at every stage and of the production process. In doing so, we aim to create a network of collaborations based on shared values of integrity, sustainability and respect for the fundamental rights of every individual.

Vitali demonstrates its commitment to Social Responsibility through the implementation of the following guidelines, in order to ensure ethical, safe and respectful working conditions for human rights:

01.	Prohibit the use of child and child labour for all persons under 16 years of age, in accordance with international and local regulations;
02.	Prohibit the use of forced and compulsory labor; it is forbidden to employ personnel against one's will and to resort to any form of work under threat of punishment;
03	Ensure a safe and healthy working environment and take effective measures to prevent potential accidents, injuries or illnesses that may occur as a result of, in connection with, or during the performance of work;
04.	Respect the right to freedom of association and collective bargaining;
05.	Prohibit all forms of discrimination and its support on the basis of race, social class, national origin, caste, birth, religion, disability, sex, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age or any other condition that could lead to discrimination;
06.	Ensure that you treat your staff with dignity and respect. Vitali does not advocate or tolerate the use of corporal punishment, mental or physical coercion, verbal abuse of staff and does not allow severe or inhuman treatment.
07.	Guarantee the right to a decent wage and fair working hours as provided for by the CCNL; Vitali guarantees the recognition of the salary provided for by the legislation and collective agreement in force.
08.	Comply with applicable laws on working hours, rest and holidays, ensuring a decent and sufficient wage
09.	Guarantee the right to equal pay for men and women for equal work. The right to equal opportunities must also be respected at the time of recruitment or dismissal and in the case of promotion and training. Any form of discrimination is prohibited, including exclusion or preference based on race, social class, national origin, caste, birth, religion, disability, sex, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age or any other condition that could lead to discrimination.

The Policy represents a formal commitment by the Company Management to operate in compliance with a Management System for Social Responsibility, in compliance with the requirements of the SA8000 standard. In this way, an additional control oversight is introduced on Social Responsibility issues, in order to promote processes of continuous improvement, fueled by risk assessment and mitigation, which can guarantee a fair and sustainable working environment.

The company is committed to ensuring that the principles of social responsibility are disseminated, understood and respected by all employees, business partners, supply chain participants and other interested parties, promoting their active involvement and encouraging constructive and fruitful interaction.

Vitali supports the active involvement of workers in the process of continuous improvement of the SA8000 management system, integrating a balanced and transversal representation of the workforce into the Social Performance Team, in order to ensure that all voices are heard and that decisions are the result of an inclusive dialogue.

The company encourages the conscious use of the communication channels set up for alleged reports or ascertained violations of the provisions of this Policy, ensuring that no discrimination or retaliation is taken against employees and/or other interested parties who send comments, recommendations, reports or complaints, while still complying with legal obligations. Reports may be sent through the channels defined in the Whistleblowing Policy, and will be managed in accordance with the provisions of the same, guaranteeing confidentiality and impartiality in the processing.

Through the Whistleblowing Policy, Vitali has regulated the management of Reports of illegitimate or illegal conduct, providing appropriate communication channels for the receipt (use of the <https://areariservata.mygovernance.it/#!/WB/VITALI> platform), analysis and processing of Reports (www.vitalispa.it).



Sustainability policies

Vitali is committed to creating value in the long term, respecting the principles of environmental, economic and social sustainability.





Our sustainability policy guides all activities

We are committed to reducing the impact of our operations on the environment and the communities in which we operate, promoting the adoption of responsible practices that help conserve natural resources and improve the quality of life.

For Vitali, sustainability is an intrinsic element of our business, around which we plan current and future activities, with the aim of building excellence in a sustainable and innovative way. We are committed to enabling a responsible ecological transition, encouraging the creation of shared value with our clients, partners and all stakeholders, ensuring that each of our steps contributes to significant and lasting progress, capable of generating benefits for future generations, for the environment and for the communities in which we operate.

The commitment to this goal is lavished with the utmost responsibility towards the environment and society and is realized through:

01.	Compliance with and compliance with all mandatory requirements (laws, regulations, contractual obligations, regulations, directives and mandatory requirements at local, national, European and international level);
02.	Human rights, respect for people and inclusion: these are fundamental principles of our policies and our approach to employees and all stakeholders. We promote constant interaction with all stakeholders and proactive listening to the legitimate expectations of local communities, so that the works carried out leave a positive legacy once completed;
03	Health, well-being and safety: we are committed to ensuring the health, well-being and safety of our employees to the highest standards in all workplaces, promoting a culture of safety", as required by our health and safety policy;
04.	Equality and inclusion: We are constantly evaluating and promoting equality and inclusion within our workforce. We support diversity as a founding value of personal growth and cultural and professional enrichment, aware that in order to better face future challenges it is necessary to have a broad and diversified vision of the development guidelines;
05.	Zero tolerance towards discrimination and inappropriate behaviour: we have a zero tolerance policy towards any form of discrimination or inappropriate behaviour;
06.	Skills development: we constantly invest in the development of our staffs skills, promoting continuous training and professional growth;
07.	Assessment Method) and other international standards that guarantee the sustainability of projects.
08.	Environmental protection: We assess, monitor and reduce our environmental impact, as described in our environmental policy. We are committed to minimizing the negative effects of our activities on the environment by adopting sustainable practices at every stage of operations. Our commitment is constantly monitored and improved, to ensure that the actions taken are effective and in line with international sustainability standards.

09.

Eco-design and sustainability: we adopt the principles of eco-design in our projects and actively contribute to the global transition to a zero-emission e-economy, with the aim of progressively reducing our consumption and generating a positive impact in the territories in which we operate. We promote the dissemination of certifications such as LEED (Leadership in Energy and Environmental Design), BREEAM (Building Research Establishment Environmental

10.

Supply chain involvement: We promote the practices and strategies adopted by companies to ensure that the entire production and procurement process complies with the principles of environmental, social and economic sustainability. This implies the integration of sustainability criteria at all stages of the supply chain, from the selection of suppliers to the final distribution of products. In addition, it is crucial to ensure that suppliers adopt ethical practices, reduce environmental impact, promote social well-being and respect workers' rights, creating a responsible and transparent supply chain that contributes to the achievement of the Sustainable Development Goals.

11.

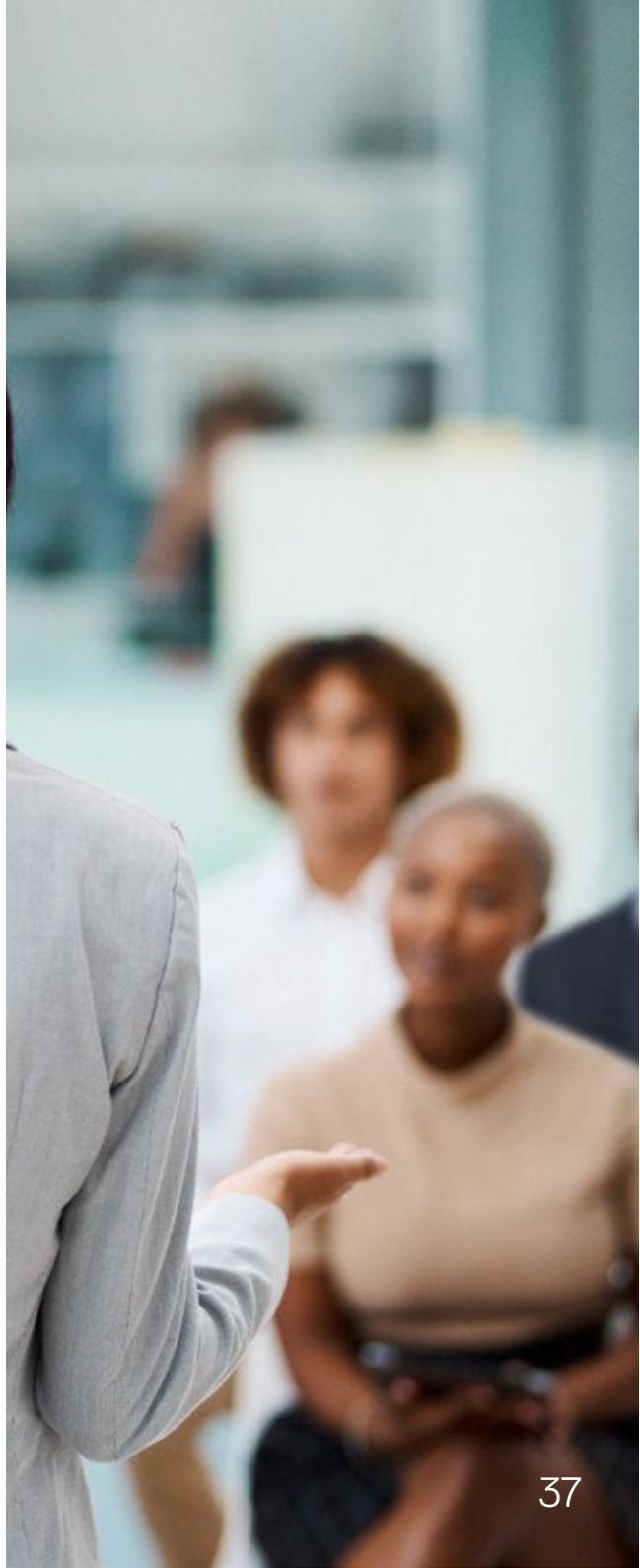
Innovation and Continuous Improvement: We promote innovation through the creation of a sustainable culture, in which ideas can be freely expressed, valued and taken into account. We are committed to maintaining a leading position in technology, design and business processes, pursuing excellence and continuous evolution.

As we grow, we are constantly striving to improve our standards, policies and procedures to ensure the effective implementation of the founding principles of this policy. The goal is to integrate sustainability into every phase of our business, seeking innovative solutions that reduce environmental impact, promote social equity and create long-term value for all our stakeholders.



Human Resource Management Policy - Human Rights

Vitali is committed to creating value in the long term, respecting the principles of



VITALI, we believe that people are our most important value. We are committed to creating a respectful, inclusive and stimulating work environment, where every employee can grow and express their potential, in full respect of human rights and promoting a culture of equity, social justice and mutual respect.

FUNDAMENTAL PRINCIPLES

01. **Enhancement of Human Capital:** Every employee is fundamental to our success. We invest in training and growth opportunities, supporting the professional and personal development of our employees.
02. **Diversity and Inclusion:** We foster an environment that celebrates diversity and ensures equal opportunities for all, without discrimination based on gender, ethnicity, religion, sexual orientation or any other personal characteristic. Inclusivity is a core value that inspires our daily actions.
03. **Fairness and Non-Discrimination:** Every person is treated with respect and dignity, ensuring equal opportunities and a safe and welcoming working environment. We fight against all forms of discrimination, promoting inclusion and the enhancement of diversity.
04. **Health and Safety:** We protect the health and well-being of our employees by creating a safe and healthy working environment that complies with occupational health and safety regulations.
05. **Respect for Human Rights:** VITALI SPA is committed to fully respecting the human rights of all its employees and all the people with whom it comes into contact. This commitment complies with international regulations and business best practices. We condemn all forms of exploitation, abuse or violation of people's fundamental rights and promote a work environment that respects the dignity and rights of each individual.
06. **Commitment against Forced and Child Labour:** The company employs only and exclusively adult personnel and firmly opposes forced labour and any form of work contrary to:
 - Human rights;
 - To the legislation in force;
 - To the agreements signed with the social partners.
07. **Sustainability:** We are committed to respecting the environment and contributing positively to the community, operating responsibly and sustainably in every aspect of our business.
08. **Equal Opportunities and Collaboration:** The company offers its human capital equal opportunities and is committed to supporting a healthy culture of collaboration. We foster an environment where people can freely express their opinions, respecting company values and fostering constructive dialogue.

OBJECTIVES

01. **Attracting and Selecting Talent:** We guarantee transparent, inclusive and non-discriminatory selection processes, aimed at identifying the best skills and ensuring equal opportunities for all.
02. **Professional Development:** We offer opportunities for continuous training and growth for all employees, implementing appropriate training and development plans (career management) to provide our employees with the best tools necessary to realize their potential.
03. **Skill Creation and Development:** We are committed to creating and developing technical skills aligned with industry trends and company values, preparing our employees for new challenges.
04. **Fostering an Inclusive Environment:** We create a space where everyone can express themselves, feel part of a team, and contribute meaningfully to the success of the company.
05. **Recognition and Awards:** We recognize excellent performance through awards, incentives and growth opportunities.
06. **Work-Life Balance:** We support flexible work policies and support family needs, promoting a healthy balance between personal and professional life.

All VITALI employees are guaranteed access to an internal complaint system (whistleblowing) that allows them to report any type of discrimination, inappropriate behavior or violation of human rights in the workplace. We ensure that whistleblowers are protected from any retaliatory action, ensuring a safe, respectful and non-discriminatory environment.

Our human resources policy aims to create a healthy, respectful and inclusive work environment, where every employee can express their potential, respecting human rights and contributing to the success of VITALI. We are committed to fostering a corporate culture that values people, respects fundamental rights and fosters inclusiveness in every aspect of our work.



Diversity, inclusion and gender equality policy

A photograph of two men in a modern office setting. One man, with short dark hair and wearing a dark green jacket, is seated at a dark wooden desk, leaning forward and writing on a notepad. The other man, with short dark hair and a beard, wearing a light green button-down shirt, is standing behind him, leaning over the desk and pointing at a laptop screen. The background is dark and out of focus, showing some office furniture and a framed picture on the wall.

Vitali is committed to creating value in the long term, respecting the principles of



Vitali is deeply committed to promoting the values of diversity, inclusion and gender equality. The company takes an integrated approach, based on respect for the dignity, freedom and fundamental rights of every individual, and is committed to creating a fair, open and inclusive work environment for all employees.

Vitali believes that diversity is a key resource for innovation and continuous improvement. Our policy is based on the following principles:

▪ **Impartiality and Non-Discrimination:** We do not tolerate any form of discrimination, direct or indirect, multiple or interconnected, related to gender, age, sexual orientation, gender identity, disability, health status, ethnic origin, nationality, political opinions, social category and religious belief. Everyone has the right to a work environment free of prejudice, in which they can freely express themselves.

▪ **Removal of Obstacles:** The company actively promotes the removal of any cultural, organizational and material barriers that may limit the expression and enhancement of the potential of each individual.

▪ **Equitable Access to Opportunity:** Vitali ensures equal opportunities for professional growth for all people, regardless of their role, and is committed to fostering an environment that allows each employee to express their full potential.

Vitali Spa actively promotes gender equality, with the aim of eliminating inequalities between men and women and promoting women's empowerment. Concrete actions include:

▪ **Fair Compensation:** The company adopts transparent remuneration policies, guaranteeing equal compensation for equivalent roles, regardless of gender, and promotes equal treatment in promotions and career opportunities.

▪ **Support for Women in the Work:** Implementation of training, mentoring and leadership programs aimed at fostering the professional growth of women within the company, and the promotion of a balance between professional and personal life.

▪ **Inclusive Communication:** Vitali adopts inclusive communication practices in all company activities, such as marketing, advertising and internal communication, to promote gender equality and raise awareness among employees on diversity and inclusion issues.

Vitali has developed specific operating procedures to manage the hiring, training, evaluation and promotion processes in order to comply with the principles of diversity and inclusion. These procedures include:

- **Recruitment and Selection:** The selection processes are structured in such a way as to guarantee fair treatment for all people, using meritocratic criteria that respect individual differences.
- **Performance Evaluation:** Performance evaluation systems are transparent and fairly enforced, to ensure that all employees have the same opportunities for advancement, regardless of their gender, background, or other personal characteristics.
- **Skills Development:** The company promotes professional development paths for all employees, with particular attention to training in inclusive leadership and diversity management.

Vitali Spa is committed to complying with international regulations and standards regarding human rights and gender equality, such as:

- 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs), with particular attention to goal n°5 "Gender Equality".
- United Nations Global Compact, and the Women's Empowerment Principles.
- Universal Declaration of Human Rights and the United Nations Conventions on the rights of women, children, persons with disabilities and against all forms of racial discrimination.
- The Conventions of the International Labour Organization (ILO), including the Convention on Violence and Harassment in the World of Work.





Vitali is committed to creating an inclusive organizational culture that values differences and promotes a collaborative and respectful work environment. The main aspects are:

- **Open and Constructive Dialogue:** The company encourages the active participation of all employees, promoting dialogue and discussion between people from different cultural, social and professional backgrounds.

- **Support for Diversity Initiatives:** The company supports internal awareness and training initiatives, through courses and workshops that deal with diversity, inclusion and gender equality issues.

Vitali also promotes diversity and inclusion externally, favoring business relationships with other companies that share the same values. This commitment extends to all phases of the contract lifecycle and in the choice of suppliers and partners.

Vitali's Management, as part of the periodic review of the integrated management system, establishes specific objectives for the continuous improvement of diversity, inclusion and gender equality policies. These objectives are regularly monitored and communicated to all stakeholders, to ensure the progressive progress and achievement of the set standards.

Vitali Spa's Diversity, Inclusion and Gender Equality policy is a key element of our corporate vision. We are committed to fostering a work environment where every individual can feel respected, valued and supported. We believe that diversity not only enriches our work environment, but also represents a fundamental value for the creation of innovative solutions and for the achievement of a sustainable competitive advantage

Sustainable procurement policy

Our corporate commitment is oriented towards "Handing over the company to those who come after us, in better conditions".

The goal is to provide sustainable results through the works and products we make, aiming to build excellence that is based on an ethical and sustainable supply chain.

We firmly believe that corporate social responsibility should not be limited to the corporate perimeter, but should positively influence the entire value chain. For this reason, we have invested and will continue to do so in sustainable sourcing, which we believe is not only ethically correct, but also an effective tool for promoting responsible behaviour throughout the supply chain.

Vitali. It respects the human rights of its employees and local communities and is committed to promoting these principles with its suppliers and subcontractors. Our goal is to identify, monitor and manage environmental, ethical, social and economic impacts along the supply chain.

For us, sustainable sourcing means integrating social and environmental factors together with economic aspects into purchasing decisions. This approach involves looking beyond traditional economic parameters, adopting a long-term view that considers the total cost of living, risks, success measures and implications for society and the environment.

In collaboration with designers and supply chain partners, the company is committed to:

- Avoid negative social, ethical and environmental impacts along the supply chain.
- Reduce the environmental impact of operations by purchasing products that meet environmental standards

The sustainable sourcing practices we adhere to at all levels of the organization include:

- | | |
|-----|---|
| 01. | Ethical Procurement: Formal request for acceptance and underwriting of ethical and anti-corruption principles by suppliers. |
| 02. | Integration of Sustainability into Contracts: Inclusion of sustainability criteria in the evaluation process of suppliers and subcontractors. |
| 03. | Circular Economy: Waste reduction, resource efficiency and preference for materials, products and services that promote the benefits of the circular economy. |
| 04. | Biodiversity and Environmental Protection: Collaboration with suppliers who actively manage their impact on natural habitats and the environment, to promote the conservation of biodiversity. |
| 05. | Eco-design: Application of eco-design principles to projects, with the aim of minimizing the environmental impacts related to the supply of materials and energy. |
| 06. | Human Rights and Labour: Procurement of goods and services in line with the international principles promoting human rights and the International Labour Organisation (ILO) Declaration on Fundamental Rights at Work. |
| 07. | Compliance with Environmental Legislation: Compliance with environmental regulations, including international obligations on climate change, reduction of CO2 emissions and protection of biodiversity. |
| 08. | Preference for Sustainable Suppliers: Selection of suppliers who have implemented ethical and sustainable practices within their organization and supply chain. |

09.

Awareness Promotion: Incentivize supply chain partners to adopt sustainable practices, spreading a culture of environmental and social responsibility.

10.

Reduction of the Environmental Impact of Deliveries: Preference for sourcing materials, products and services from local markets and reduction of the impact of deliveries.

11.

Hazardous Substances and Material Health: We promote safe and low-impact materials, limiting the use of hazardous substances and promoting compliance with regulations to protect health and the environment.

12.

Responsible Waste Disposal: Promoting the reuse and recycling of materials at the end of their life cycle, ensuring proper disposal when recycling is not possible.

In contracts with suppliers and subcontractors, the company provides:

- Compliance with legislative requirements in terms of ethics, integrity and anti-corruption.
- Compliance with the REACH regulation for the management of chemical products, reducing the use of substances harmful to the environment.
- Preference for recyclable packaging, wood and FSC-certified paper, ensuring that the product comes from a responsibly managed forest.
- Purchase of FSC-certified cellulose fiber, to promote the sustainability of natural resources.
- Selection of steel suppliers that implement measures for the health and safety of workers, energy efficiency and the reduction of environmental pollution.
- Promotion of local distribution, to reduce the impact of deliveries and promote sustainable sourcing.
- Priority to suppliers and subcontractors who implement sustainable development practices and participate in voluntary certification programs.
- Reduce the environmental impact deriving from operational activities, by purchasing products that comply with environmental standards.

Vitali is committed to making sustainability an integral part of its business strategy, with a continuous approach to improving internal practices and supply chain relationships . We want business decisions, even everyday ones, to help create a better future for people and our planet.



Management system policy for Road safety

Vitali is committed to creating value in the long term, respecting the principles of environmental, economic and social sustainability.

The Vitali company is committed to providing human, instrumental and economic resources to ensure the highest level of safety for its workers who travel the roads. This is a key priority for the company, which considers the protection of its employees to be an essential value.

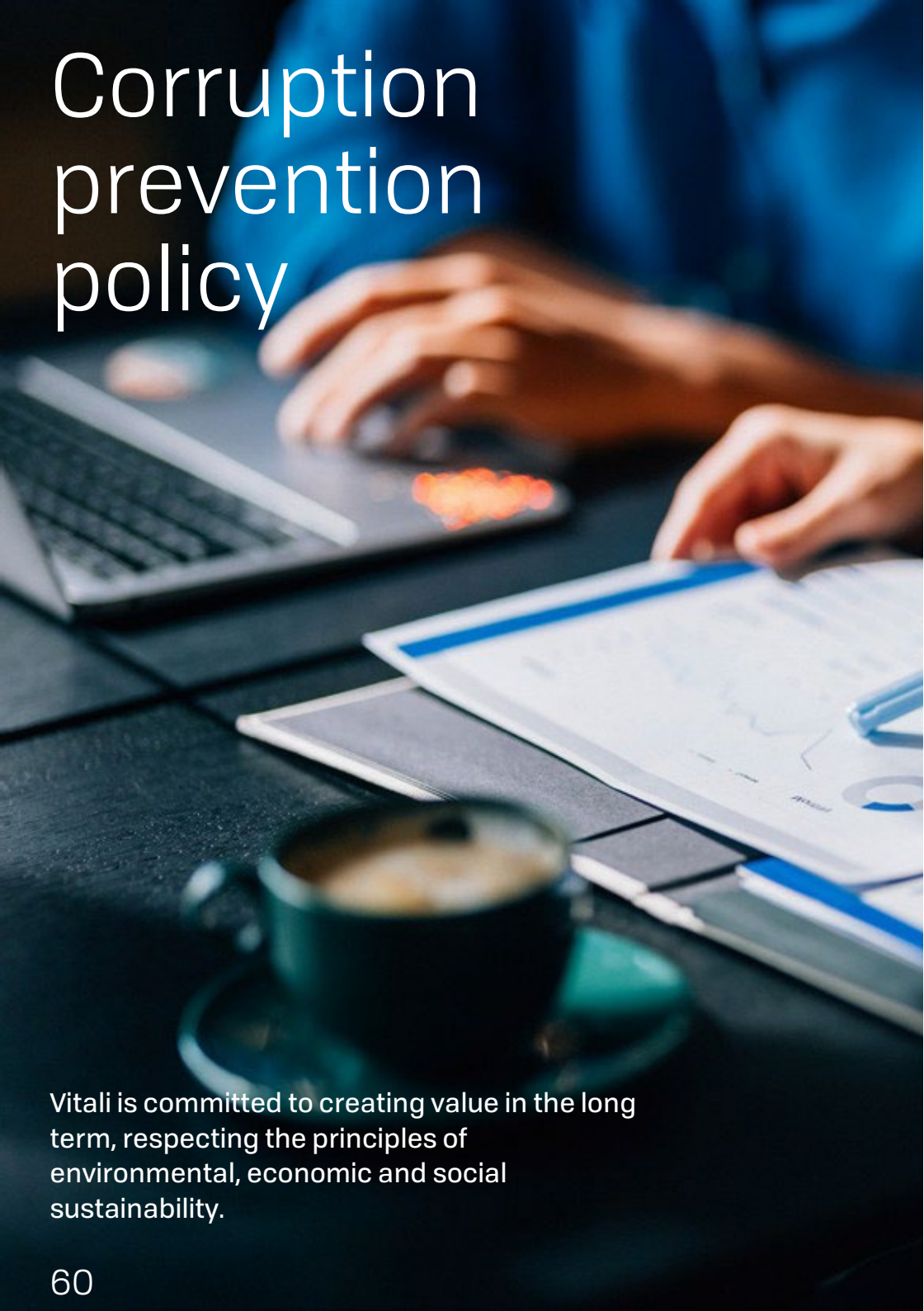
Vitali is fully aware that the continuous improvement of its road safety performance brings significant benefits for all stakeholders, helping to meet the expectations of improvement in relation to the context in which the company operates and the daily challenges that arise. In this sense, the company is actively committed to improving safety conditions not only for its workers, but for the entire community involved.

Vitali is therefore committed to pursuing a policy of continuous improvement of its performance in terms of road safety, prioritising prevention and adopting concrete measures to reduce, where technically possible and economically sustainable, the risk of road accidents along the routes that its workers take to reach the workplace or the premises of customers and suppliers.

The company makes public and widely disseminates the information contained in this document, committing itself to the implementation of the following concrete actions:

01. The implementation and maintenance of a **Road Traffic Safety Management System** compliant with the requirements of the ISO 39001 standard, to ensure effective management of the risks associated with road traffic;
 02. **The continuous research and adoption of corrective** and improvement actions to constantly increase the performance of the Road Traffic Safety Management System, with a strong focus on risk prevention;
 03. **Full compliance with all current regulatory provisions** on road safety, as well as compliance with any codes of practice and agreements signed governing safety in company activities;
 04. The guarantee of **adequate continuous training for workers**, aimed at increasing their professionalism and maintaining a high awareness of the risks related to road safety, for responsible and safe behavior;
 05. **The implementation of every possible organizational, operational and technological effort** to prevent road accidents, with the maximum involvement of the interested parties, whether they are employees, suppliers or external partners;
 06. The care of the **regular maintenance of all company vehicles**, including vehicles and operating machines, with the adoption of careful preventive controls to ensure maximum reliability and safety during use;
 07. The **dissemination** of road safety objectives **within the company**, encouraging the active participation of personnel, the timely reporting of potential dangers and the improvement of the safety culture.
- In the context of the periodic review of the integrated system by the Management, concrete and measurable objectives are constantly defined and distributed to all interested parties, aimed at the continuous improvement of the road safety management system, with a particular focus on the effectiveness and efficiency of the actions undertaken.

Corruption prevention policy

A person wearing a blue shirt is seated at a dark desk, working. Their hands are visible, with one hand on a laptop trackpad and the other near a tablet. The laptop is open to the left, and the tablet is in the center. A cup of coffee on a saucer is in the foreground. The background is blurred, showing the person's torso and the desk environment.

Vitali is committed to creating value in the long term, respecting the principles of environmental, economic and social sustainability.



The Vitali company is fully aware that the phenomenon of corruption represents a significant obstacle to the economic, political and social development of a country, as well as a serious distortion of the rules, fairness and competitiveness of the markets. In this context, Vitali has adopted a rigorous management system aimed at keeping the corruption phenomenon under control, through continuous training for its workers and the active involvement of business partners.

In application of this commitment, Vitali's Corruption Prevention Policy is based on the following principles and measures:

01. **Strict Compliance with Current Legislation:** the company is committed to full and strict compliance with all current regulations on the prevention and fight against corruption, both in Italy and in any other country in which the organization operates. This commitment extends to all employees, collaborators, partners and external parties who work for or under the control of the company.
02. **Prohibition of Corruption and Attempts at Corruption:** it is absolutely forbidden for any employee, collaborator, partner or supplier to engage in conduct that may constitute acts of corruption or attempted corruption, both towards public and private entities. The company has strict policies in place to prevent any risk of corruption in all its activities.
03. **Risk Analysis and Identification of Critical Areas:** Vitali has carried out an accurate analysis of the context in which it operates, in order to identify the business areas most exposed to the risk of corruption. As a result of this analysis, specific preventive and corrective actions were identified to minimise risks and ensure compliance with anti-corruption regulations.
04. **Commitment of All Stakeholders:** all company stakeholders, including employees, collaborators and business partners, are required to comply with the principles and directives of the management system for the prevention of corruption. The company provides ongoing support, training, and monitoring to ensure the effectiveness of these measures and the integrity of the system.
05. **Awareness and Continuous Training:** the company is committed to constantly raising awareness and training its employees and collaborators on issues related to the prevention of corruption. The training includes theoretical and practical sessions to raise awareness of corruption risks and how to avoid them. In addition, a corporate culture of transparency, accountability, and ethics is promoted.
06. **Anonymous and Protected Reporting System:** Vitali has set up a reporting system that allows anyone (employees, collaborators, suppliers, partners) to securely and anonymously report any suspicion of violation of the anti-corruption policy. Reports will be treated with the utmost seriousness and confidentiality, ensuring the total protection of whistleblowers against retaliation, discrimination or penalization, without prejudice to legal obligations.

07. **Sanctioning System and Consequences for Violations:** Any employee, collaborator, partner or supplier who does not comply with the provisions of the policy for the prevention of corruption will be subject to disciplinary sanctions. The penalties will be proportionate to the seriousness of the breach and may include internal corrective measures up to the termination of the contract in the event of serious breaches. The company guarantees that any violation case will be treated with fairness and transparency.

08. **Anti-corruption compliance:** Vitali monitors the implementation and compliance with anti-corruption policies within the organization, in order to ensure the effective implementation of anti-corruption measures and independence in supervisory activities.

09. **Promotion of Ethical Practices between Business Partners and Suppliers:** the company actively promotes, among its business partners, suppliers and business partners, the adoption of policies and actions for the prevention of corruption. It is committed to encouraging the creation of a network of entities that operate in compliance with the same ethical and legislative standards, to ensure consistency and integrity throughout the supply chain and in commercial relations.

10. **Monitoring and Periodic Review:** to ensure the effectiveness of the management system for the prevention of corruption, the company will carry out continuous monitoring of the measures adopted and a periodic review of the anti-corruption policy, in order to make any necessary changes based on regulatory, organizational and operational changes.

Vitali's Corruption Prevention Policy represents a solid and continuous commitment to ensure an ethical, transparent and compliant work environment with anti-corruption regulations. The adoption of these measures is essential to preserve the integrity and reputation of the company, ensuring that all activities are conducted in a fair, loyal manner and in full compliance with the law



Energy policy

Vitali Spa's mission is to safeguard the environment through careful and sustainable management of energy resources

The company is committed to constantly analyzing the significant aspects of its activities, in order to anticipate possible environmental impacts, using available resources in a rational and sustainable way. The adoption of renewable resources is privileged, where possible, by limiting the use of non-renewable resources.

Vitali Spa considers the continuous improvement of energy efficiency as a strategic objective, pursuing the rational use of energy sources. To this end, the company has adopted an Energy Management System (EMS), a systematic approach that promotes efficient energy management, with the aim of achieving the following objectives and commitments:

Vitali is committed to combining energy efficiency with environmental sustainability, pursuing continuous improvement through the adoption of innovative solutions, staff education and compliance with regulations. Our mission is to contribute to a more sustainable future by minimizing the impact of our activities on the environment and maximizing the efficiency of energy resources.

01. **Regulatory Compliance and Continuous Improvement:** the company ensures compliance with local, national, European and international regulations, including legal and contractual obligations. In addition, it is committed to constantly improving the performance of the Energy Management System (EMS), promoting collaboration and coordination between company resources for a correct and rational use of energy, with the aim of reducing environmental impacts.

02. **Energy Efficiency and Reduction of CO2 Emissions:**

- **Investments in renewable energy:** The company is committed to making its energy fully sustainable and renewable through the targeted investments.
- **Consumption monitoring:** Constant and detailed monitoring of energy consumption is provided to ensure maximum efficiency.
- **Innovative Solution Search:** The company explores and implements technological and management solutions, such as building insulation, the use of LED lamps, and heat recovery, to reduce energy consumption.
- **Adoption of renewable technologies:** Vitali promotes the use of renewable photovoltaic plants, thermal and electrical storage systems, low-enthalpy geothermal energy and other innovative technological solutions for increasing the use of renewable energy sources.

03. **Purchasing and Design for Energy Efficiency:** the company encourages the purchase of products and services that are energy efficient, with particular attention to the design of plants, machines and equipment that optimize energy consumption. Energy consumption is considered a fundamental criterion when purchasing goods and services.

04. **Compliance with Legislative Requirements:** Vitali undertakes to fully comply with the applicable regulations on the use of energy and the contractual obligations signed with third parties, ensuring compliance with the laws and regulations in force.

05. **Staff Training and Awareness:** The company invests in the continuous training of internal staff and external companies operating on behalf of Vitali, raising their awareness of the importance of efficient use of energy. The training and communication programs are particularly focused on company areas with significant energy consumption.

06. **Communication and Involvement with the Community and Stakeholders:** Vitali guarantees transparent communication on the results of its energy performance. The company aims to spread the culture of sustainability, promoting a conscious management of resources and the importance of reducing environmental impacts.

Information Security Policy

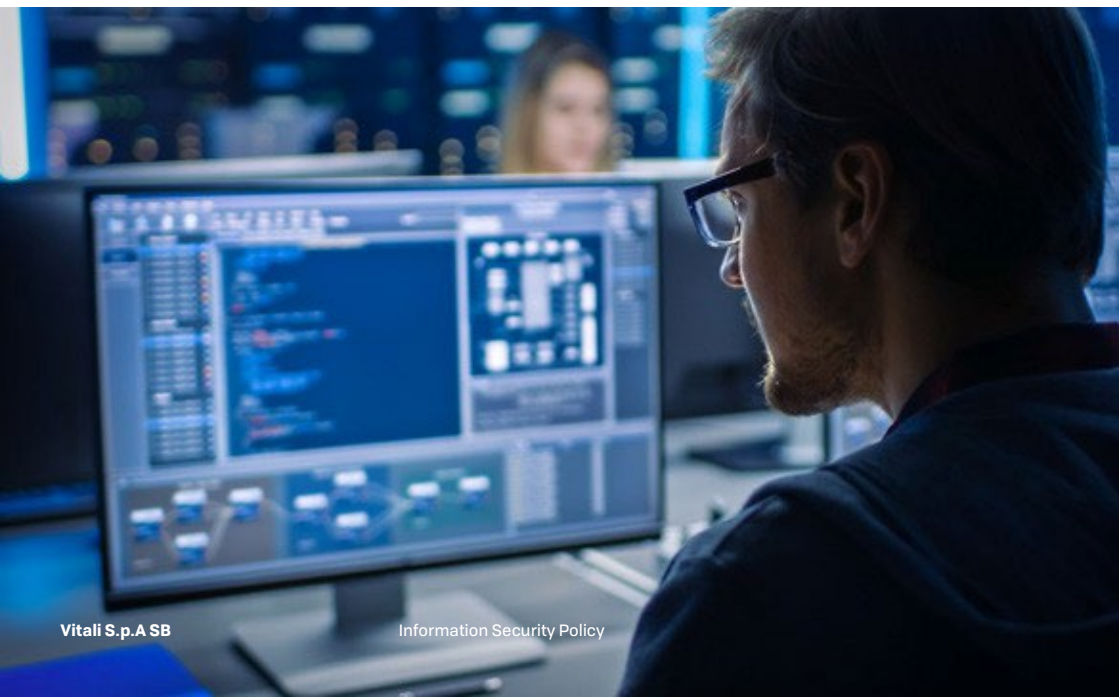
The VITALI Company undertakes to protect all information, both electronic and paper, from any potential threat, in line with the classification assigned, from its creation to its use and subsequent disposal



Information protection is essential to ensure the security, confidentiality, integrity and availability of data, and to preserve the company's reputation, customer trust and compliance with applicable regulations.

Main Objectives of the Information Security Policy

01. **Protection of sensitive information:** Information must be treated securely, accurately, and reliably, while adhering to the principles of confidentiality, integrity, and availability.
02. **Controlled access to information:** Access to information must be restricted and regulated, to prevent it from being used in an unauthorized manner.
03. **Compliance with regulations:** Ensuring compliance with local laws, international regulations and company policies, particularly with regard to the protection of personal data and the security of information.



Commitments of the VITALI Company

The VITALI Company undertakes to follow the following principles and to implement the necessary measures for the protection of information:

01.

Confidentiality:

- Ensuring that information is protected against unauthorized access uncontrolled dissemination or dissemination.
- Introduce technological and procedural measures to protect confidentiality.
- Implement physical and logical security measures to protect sensitive company data.

02.

Integrity:

- Protect your information against unauthorized modification or damage accidents, including changes resulting from human error, technology failures, or cyberattacks.
- Use verification and monitoring technologies to ensure that information is accurate and consistent.
- Implement periodic auditing processes to detect and correct any anomalies.

03.

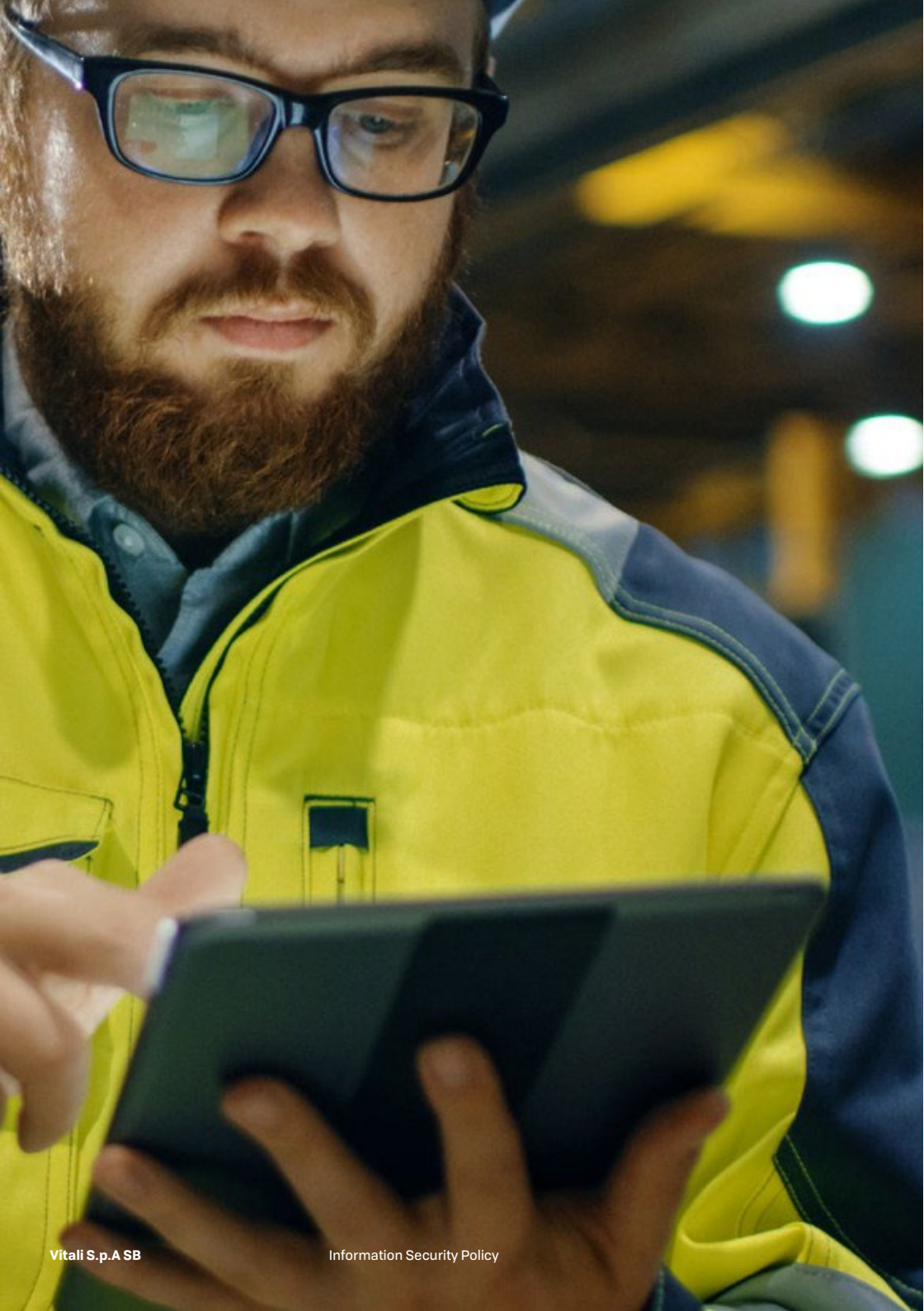
Availability:

- Ensure that information is easily accessible to users. and are available when needed for business operations.
- Implement regular backup solutions and disaster recovery plans to ensure business continuity.
- Continuously monitor the health of your company's ICT infrastructure to prevent interruptions or data loss.

04.

Risk management and cybersecurity:

- Perform systematic risk analyses to identify potential threats to information security and implement the necessary controls.
- Regularly review and adapt security policies to respond to the evolution of external and internal threats (cyberattacks, malware, phishing, etc.).
- Implement multi-layered defenses against cyber threats, including firewalls, antivirus, encryption, and intrusion detection systems



05.

Legal and regulatory compliance:

- Ensure compliance with personal data protection regulations (e.g. GDPR) and other local or international laws regarding information security.
- Monitor the level of corporate compliance with internal policies and applicable regulations through regular audits and compliance reviews.

06.

Security incident management:

- Create an Incident Response Plan that defines the procedures to be followed in the event of a data breach or security incident.
- Properly record and maintain evidence of security incidents, including for the purposes of possible legal action or future improvements.
- Promptly communicate to internal and external stakeholders, as required by law, in the event of incidents involving sensitive personal data.

07.

Continuous improvement :

- Promote a corporate culture oriented towards the safety of the training, constantly updating company policies and protection measures.
- Invest in advanced technologies and innovative solutions to improve data protection and ensure resilience against emerging threats.
- Plan regular training programmes to raise awareness and train staff on the importance of information security and best practices.

08.

Training and awareness:

- Organize training courses for all employees, focused on secure information management and awareness of potential threats and support awareness-raising activities that highlight the importance of information security, personal data protection and risks related to insecure practices.

09.

Legal and regulatory compliance:

- Ensure compliance with personal data protection regulations (e.g. GDPR) and other local or international laws regarding information security.
- Monitor the level of corporate compliance with internal policies and applicable regulations through regular audits and compliance reviews.

Every employee, contractor and supplier is responsible for the correct handling of company information and must comply with the security policies in force. Information security officers, including IT managers, are responsible for monitoring the application of this policy and responding to any non-compliance.

The VITALI Company is committed to taking all necessary measures to protect company information, protecting the privacy of its customers, employees and stakeholders. Information protection is a shared responsibility that involves every level of the organization and must be continuously monitored, revised and improved.



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