
SALCEF GROUP INTEGRATED POLICY

The Management of the Salcef Group is committed to providing its clients with excellent services as regards the design, construction and maintenance of railway, tramway and metropolitan railway lines and the related civil works, works in the field of electrical traction, substations and railway signalling, the distribution of high and medium voltage energy by means of overhead and underground lines, also through the supply of the related components, as well as the provision of machinery, vehicles and rolling stock for the construction, renovation and maintenance of infrastructures and the design and production of prefabricated components for railway infrastructure.

With its activities, Salcef promotes the **development of sustainable transport** through the reduction of its impact on natural resources, the lowering of emissions and the increase in the comfort and quality of transport provided to passengers and bases its business activities on this approach. Indeed, the Salcef Group has structured its corporate system around compliance with human and labour rights, environmental protection and the fight against corruption; therefore, as a signatory member of the United Nations **Global Compact**, it bases its policy on the *Ten Principles*:

1. Supporting and upholding the protection of internationally proclaimed human rights;
2. Ensuring non-complicity in human rights abuses;
3. Supporting freedom of association and the effective recognition of the right to collective bargaining;
4. Eliminating all forms of forced and compulsory labour;
5. Abolishing child labour;
6. Eliminating discrimination in respect of employment and occupation;
7. Supporting a precautionary approach to environmental challenges;
8. Promoting greater environmental responsibility;
9. Encouraging the development and diffusion of environmentally friendly technologies;
10. Working against corruption in all its forms, including extortion and bribery.

Moreover, the Management of the Salcef Group **is committed** to promoting a culture based on quality, environmental and energy protection, safety, social responsibility, inclusion and the prevention of corruption at every level of its organisation; said culture will be developed through the full involvement and engagement of its staff, favouring the consultation and participation of its suppliers and all interested parties.

To this end, compliance with the following items is deemed fundamental:

- the requirements and principles referred to in the standards UNI ISO 9001 - Quality Management System, ISO 45001 - Occupational Health and Safety Management System, ISO 39001 - Road Traffic Safety Management System, ISO 14001 - Environmental Management System, ISO 50001 - Energy Management System, SA 8000 - Social Accountability Management System, ISO 37001 - Anti-Bribery Management System, ISO 30415 - Human Resources Management - Diversity and Inclusion; ISO 55001 - Asset Management; ISO 27001 - Information security management systems;;
- all applicable legal and regulatory requirements.

This policy is also drafted in line with the following internal documents that support its implementation:

Salcef Group S.p.A.

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- [Ethical and Conduct Code of Salcef Group](#)
- [Suppliers' Code of Conduct](#)
- [Regulations of Salcef Group Supplier Qualification System](#)
- [Organisation, Management and Control Model \(Governance Model\) - General Part](#)
- [Diversity, Equity and Inclusion Policy](#)
- [Human Rights Policy](#)

The Management believes that the Quality of the products and services offered is the key to achieving a leading position on the market; therefore, with regard to the **Quality Management System**, the Management aims at pursuing the following corporate **goals**:

1. Ensuring the quality of works, products and machinery and of design and engineering services by understanding and satisfying the client's needs, continuously improving the effectiveness and efficiency of production processes;
2. Contributing to the development of technologies for integrated and sustainable mobility;
3. Consolidating its leading position in the Italian market and continuing to grow in the international market;
4. Investing in research into new services, products and technologies with a view to proposing an integrated, complete, multidisciplinary offer in the railway industry;
5. Optimising the digitisation and updating of corporate processes by promoting the use of new technologies for centralising and sharing information.

The Management of the Salcef Group bases its decisions on a corporate risk assessment approach that enables the organisation to determine the factors that could produce process deviations and to put in place pre-emptive measures to minimise negative effects and take advantage of the opportunities offered by the market, thereby anticipating its trends.

In considering health and safety as paramount, the Management aims at pursuing the following corporate **goals** through the **Occupational Health and Safety Management System**:

1. Ensuring safety in the workplace by defining and implementing actions to reduce risks, with a view to preventing occupational diseases and work-related accidents and achieving "zero accidents";
2. Preventing and correcting any dangerous situation, including "near misses", promoting their reporting and systematically analysing their causes and possible remedies;
3. Pursuing a constant increase in safety performance;
4. Ensuring the protection of the physical and mental health of the people who work within the Salcef Group;
5. Assessing the risks related to changes in production activities resulting from new equipment or changes in the working environment, prior to the changes themselves.

The Salcef Group considers the protection and promotion of personal health, safety and welfare as a priority value and principle in all its activities. Therefore, its operating method is aimed at the protection of employees, clients, suppliers and, in general, anyone who falls within the sphere of influence of the Salcef Group.

In addition, the Management is aware of the fact that the continuous improvement in performance in terms of Road Safety brings about significant benefits for all stakeholders, thereby leading to the meeting the

improvement expectations related to the context in which the company operates; therefore, it has integrated the **Road Traffic Safety Management System** into its organisation.

Therefore, the Management is committed to pursuing continuous improvement in its performance in terms of Road Safety, promoting prevention and minimising, where technically possible and economically viable, the risk of road accidents in the Salcef Group's operating sites, in its own operating premises and on the roads leading to them.

The Management is committed to achieving the following **goals**:

- Ensuring the continuous improvement of the performance of the Road Traffic Safety Management System and the focus on prevention;
- Ensuring that activities are carried out in accordance with current legal provisions and any codes of practice subscribed to;
- Ensuring adequate training for its workers and maintaining a high level of attention to Road Safety, also communicating its objectives, encouraging staff participation and reporting potential hazards;
- Making every effort in organisational, operational and technological terms to ensure the maximum involvement of stakeholders to prevent road accidents;
- Ensuring the regular maintenance of its own vehicles and operating machinery, promoting preventive checks so as to ensure maximum reliability.

At the same time, in seeking continuous improvements in its environmental performance, the Management aims at pursuing the following corporate **goals** through the **Environmental Management System**:

1. Employing processes and technologies able to prevent and/or reduce impact on the environment;
2. Managing production activities in such a way as to reduce the environmental impacts directly related to them, with particular attention to the management of waste, emissions into the atmosphere, the consumption of raw materials and risks associated with the use of pollutants;
3. Pursuing a constant increase in environmental performance.

In considering the protection of the environment as essential to the quality of life and sustainable development, the Salcef Group, as a concrete demonstration of its commitment to environmental protection, aims at reconciling economic development and value creation needs with environmental friendliness and protection.

Furthermore, the Management is aware of the importance of the rational use of energy, and has therefore integrated the **Energy Management System** into its organisation, through which the Management aims at achieving the following corporate **goals**:

1. Employing processes and technologies able to reduce and/or minimise energy impacts;
2. Pursuing the achievement and continuous improvement of energy performance and the way in which energy is used and consumed;
3. Promoting the optimal use of energy resources, favouring the consumption of energy from renewable sources;
4. Defining the requirements of energy-efficient products prior to their purchase in order to improve their energy performance.

Finally, the Salcef Group is firmly convinced that its commitment to the prevention of Bribery can influence a progressive diffusion of ethical principles and values; therefore, through the **Anti-Bribery Management**

System, the Management of the Salcef Group is committed to avoiding organisational, ethical and relational uncertainty, and aims at pursuing the following corporate **goals**:

1. Clearly defining its processes;
2. Clearly defining and documenting the roles, responsibilities and powers of its staff and an effective proxy system;
3. Ensuring a linear system of rules, values and procedures to facilitate decision-making within the organisation;
4. Ensuring a management system for the procurement of goods and services excluding fraudulent suppliers and supplies through the regular checking of suppliers' qualifications;
5. Ensuring an adequate internal monitoring system aimed at promoting correct conducts and regular corporate processes for all employees, suppliers and collaborators of the Group.

Moreover, given the negative effects of bribery practices on the economic and social development of the environment in which it operates, the Management of the Salcef Group adopts a firm approach and is adamant in prohibiting any form of corruption as a concrete demonstration of its commitment to the Prevention of Bribery.

Therefore, the prevention of bribery is not only a legal obligation, but also one of the principles on which the Salcef Group's actions are based.

In addition to this Integrated Policy, the Salcef Group has defined:

- A Code of Ethics defining the values and principles that the companies of the Salcef Group are inspired by and committed to respecting in the pursuit of their mission;
- A Management System for the Prevention of Bribery according to ISO 37001;
- An Organisation and Management Model pursuant to Italian Legislative Decree 231/2001.

The Salcef Group aims at ensuring correctness, fairness, integrity, loyalty and professional rigour in its operations, and therefore prohibits any form of bribery, requires compliance with the law and is committed to adopting and enforcing the Anti-Bribery Management System, also in order to increase the awareness of all stakeholders on the rules and conducts that must be observed.

In carrying out its activities, the staff must adhere to transparency, clarity, correctness, integrity and fairness principles; in business relations, behaviours and practices that may even only appear illegal or collusive, payments that may appear unlawful, favouritism, and direct or indirect solicitation of personal and career advantages for oneself or for others are prohibited.

The Salcef Group ensures the authority (as defined by the responsibilities assigned to the department and made known to all company staff) and independence (as guaranteed by non-involvement in activities identified as being at risk of bribery) of the department responsible for the prevention of corruption, as represented by the Head of Internal Audit and Compliance.

In case of bribery-related behaviours and violations of the Italian Law on corruption, those who work in the name and on behalf of any company of the Salcef Group are aware of incurring in offences punishable not only at criminal and administrative level, but also at disciplinary level. Therefore, the companies of the Salcef Group require their "Business Partners" to comply with applicable laws, the codes of ethics of the companies and this Policy, on the basis of clauses that, if not complied with, shall result in the termination of the contract.

In order to ensure that this **Integrated Policy** is understood, implemented and supported at all company

levels and by all Salcef Group collaborators, the Management has implemented the following **initiatives**:

- Raising awareness of all stakeholders on the obligations under this Integrated Policy;
- Ensuring the involvement of stakeholders in the processes whereby the goals of the Integrated Management System are defined;
- Ensuring the Staff's continuous training and education on the basic elements of the Integrated Management System;
- Informing suppliers that, in addition to quality and economic aspects, aspects relating to social accountability, environmental sustainability and health and safety will also be taken into account when qualifying and assessing supplies;
- Promoting a whistleblowing procedure for sending bona fide reports of alleged or ascertained violations of the provisions and principles of this Policy, guaranteeing the confidentiality of the content of the reports, the identity of the reporting and reported person and the protection of the reporting person from any discrimination or retaliation;
- Providing all stakeholders with appropriate communications on the requirements and performance of the Integrated Management System;
- Continuously checking the Integrated Management System through a critical analysis of the results obtained in order to pursue the achievement of the defined objectives and continuous improvement.

This Policy is reviewed during periodic Management Reviews in order to verify its suitability and is disseminated to all staff and stakeholders through the Salcef Group's institutional website.

Rome, 16/03/2023



Valeriano Salciccia
Chief Executive Officer

Translation from the Italian original which remains the definitive version.