

Brugherio, 29/07/2025

## **Subject: INTEGRATED COMPANY POLICY**

### **1. Regulatory References**

**ISO 14001:2015, ISO 9001:2015, ISO 45001:2023, PAS 24000, UNI/PDR 125, Regulation (EU) 2016/679 (GDPR), Legislative Decree 231/2001, Legislative Decree 81/08, SDGs 2025, United Nations Sustainable Development Goals (SDGs).**

### **2. Introduction**

Fimo Group is an international industrial group that designs, manufactures, and markets advanced components and systems for mobile telecommunications infrastructure. With a direct presence in Europe, Asia, and North America, we serve the main operators and system integrators in the sector, with a particular focus on the reliability, durability, and technical innovation of our products. FI.MO.TEC S.p.A. is committed to promoting a corporate culture that integrates quality, environmental protection, occupational health and safety, social responsibility, and gender equality. The company strives to operate ethically and sustainably, ensuring high quality standards in every production process. This integrated policy reflects the organization's commitment to conducting its activities responsibly, focusing on customer satisfaction, environmental protection, employee safety and well-being, and fostering an inclusive and respectful workplace. Our mission is to provide high-quality products and services, in compliance with regulations and the expectations of the community and stakeholders, thus contributing to sustainable and responsible development.

### **3. Purpose and Objectives**

The Integrated Management System aims to ensure that all FIMOTEC activities are carried out in compliance with the following principles:

- Continuous improvement of product and service quality, through the adoption of advanced technologies, innovative processes, talent management, and the development of new skills.
- Environmental protection and reduction of environmental impacts, with a focus on the sustainable management of natural resources and waste.
- Prevention of accidents and promotion of occupational health and safety, through strict prevention and control policies.
- Social responsibility towards local communities and stakeholders, actively contributing to the economic and social development of the region.

- Promotion of gender equality and inclusiveness, creating a workplace where everyone can express their full potential.
- The actions and objectives defined in this Integrated Company Policy are aligned with the United Nations Sustainable Development Goals (SDGs), in particular: SDG 3, 5, 6, 8, 9, 11, 12, and 13.

## 4. Principles and Commitments

### 4.1 Quality and Customer Satisfaction

- **Customer Focus:** We actively listen to our customers to understand their needs, anticipate trends, and develop solutions that effectively address their technical and operational challenges. Customer satisfaction is a key indicator of our success.
- **Innovation and Continuous Improvement:** we continuously invest in research and development, process digitalization, and the training of our people to improve the quality of our products and processes. Every nonconformity is seen as an opportunity to improve.
- **Quality in Design and Production:** we apply engineering methodologies and rigorous validation processes in the design of our components, ensuring that each product meets the required industry standards and international regulations. Every production site adopts integrated quality control systems throughout the entire value chain.
- **International Standards and Regulatory Compliance:** We are committed to maintaining compliance with applicable national and international regulations (e.g., ISO 9001), as well as the specific standards required by our customers or target markets.
- **Culture of Responsibility:** Every member of Fimo Group, regardless of their role or location, is responsible for the quality of their work. We promote a culture of engagement and accountability, encouraging everyone's active contribution to improving the effectiveness of our Integrated Management System.

### 4.2 Environmental Protection

- **Emission Reduction:** we monitor and reduce greenhouse gas emissions and other pollutants by using clean technologies and processes. We prioritize the purchase of low environmental impact company vehicles.
- **Waste Management:** We promote waste sorting and the use of recyclable materials in both production processes and packaging.
- **Resource Efficiency:** we continuously improve energy and water efficiency.
- **Circular Economy:** we are committed to following circular economy principles, promoting product design for recycling and reuse at end-of-life, thereby reducing overall environmental impact.
- **Product Life Cycle:** we apply a life-cycle perspective in the design and management of our products, focusing on efficient resource use, durability, and end-of-life considerations.

#### 4.3 Occupational Health and Safety and Legislative Decree 81/08

- **Injury Prevention:** we implement preventive measures to minimize workplace risks and ensure safe conditions for all employees. We conduct regular risk assessments and implement emergency plans to mitigate any potential hazardous events. We maintain an up-to-date Risk Assessment Document (DVR), use a registry for Personal Protective Equipment (PPE), and focus on regular maintenance of machinery, systems, and facilities.
- **Employee Engagement:** we promote the active participation of workers in health and safety initiatives by providing continuous training and updates. Every employee plays an active role in prevention and in maintaining workplace safety, contributing to a company culture focused on health protection.
- **Smart Working and Work Flexibility:** We promote flexible work policies and smart working to improve employee well-being and support work-life balance.

#### 4.4 Social Responsibility and Gender Equality

- **Social Initiatives:** FIMOTEC is committed to supporting non-profit organizations operating in social and environmental fields.
- **Gender Equality:** we promote gender equality in all company areas, ensuring equal opportunities and fighting all forms of discrimination. We are committed to raising awareness and fostering an inclusive workplace that values differences and promotes mutual respect.
- **Working Conditions:** we respect human and labor rights, ensuring decent working conditions and a discrimination-free environment. We support employee well-being through initiatives aimed at improving quality of work life and work-life balance. A dedicated room for recreational activities is available in the offices.

#### 4.5 Sustainable Supply Chain

- **Supplier Code of Conduct:** we collaborate with suppliers who share our values in quality, environment, safety, and social responsibility. Suppliers are subject to periodic evaluations (Vendor Rating) to verify compliance with our standards and to promote continuous improvement in environmental and social performance.
- **Green Procurement:** we prioritize sustainable sourcing, choosing materials and suppliers with low environmental impact. This approach helps us reduce the environmental footprint of our supply chain and promotes the use of recycled materials and renewable resources.
- **Traceability and Due Diligence:** we implement traceability systems for materials and conduct due diligence to ensure human rights are respected throughout our supply chain, thus contributing to the social sustainability of our operations (Supplier Audit Checklist).

#### 4.6 Talent Management and Skills Development

- **Employee Development:** we emphasize the continuous development of employee skills, offering training programs to address future challenges and adopt new technologies. We invest in internal talent to create a dynamic work environment capable of responding to market changes, also using indicators to monitor professional skill development.

#### 4.7 Resilience and Risk Management

- **Risk Management:** In light of recent global challenges, we are committed to enhancing organizational resilience and risk management, including risks related to climate change and pandemics. We implement risk management strategies to prevent and mitigate negative impacts on operations and stakeholders.

#### 4.8 Employee Engagement in Sustainability

- **Active Participation:** we promote specific initiatives to actively engage employees in the company's sustainability efforts. We encourage responsible behavior and the adoption of sustainable practices.

#### 4.9 Data Protection and Regulation (EU) 2016/679 (GDPR)

- **Personal Data Protection of Employees, Customers, and Suppliers:** we are committed to implementing all necessary technical and organizational measures to protect personal data from unauthorized access, loss, disclosure, or alteration. We minimize data collection and processing, limiting it to what is strictly necessary for business operations.
- **Use of Encryption and Firewalls:** we have adopted security measures to prevent unauthorized access, such as encryption systems, firewalls, and procedures for managing data subject rights, ensuring access, rectification, erasure, and objection rights are respected.

#### 4.10 Administrative Liability and Legislative Decree 231/01

- **Organizational Model:** The company adopts an organizational model in compliance with Legislative Decree 231/01, regularly approved by the Board of Directors.
- **Supervisory Body (SB):** a Supervisory Body has been established to monitor the implementation of the model and ensure regulatory compliance.
- **Regular Employee Training:** we have increased training on the model's provisions and on appropriate behaviors to prevent the commission of criminal offenses.
- **Whistleblowing System:** we have adopted a "whistleblowing" system that ensures anonymity and protection for individuals reporting illegal conduct.

#### 4.11 Ethics and Anti-Corruption

FI.MO.TEC S.p.A. recognizes that integrity, transparency, and business ethics are fundamental pillars for building stakeholder trust, ensuring business continuity, and protecting corporate reputation.

- **Zero Tolerance:** For this reason, the company adopts a zero-tolerance policy toward corruption in all its forms (active, passive, public, private), extortion, fraud, and other unethical conduct.
- **Code of Ethics:** Every employee, collaborator, supplier, or partner is required to comply with the company's Code of Ethics, which clearly defines acceptable and unacceptable behavior.
- **Training and Awareness:** FI.MO.TEC promotes a culture of ethics through periodic training activities for all personnel, focusing on anti-corruption, conflict of interest, and individual responsibility.
- **Confidential Reporting System (Whistleblowing):** A secure and confidential channel is active for the reporting – even anonymously – of illegal or unethical conduct. Reports are handled confidentially, ensuring protection against retaliation for the whistleblower.
- **Internal Controls and Audits:** The company conducts periodic controls on sensitive processes, particularly in purchasing, commercial relations, gifts, travel, and sponsorships, to prevent or detect any non-compliant practices.
- **Compliance with Legislative Decree 231/01:** The anti-corruption commitment is an integral part of the Organizational Model 231 adopted by the company and monitored by the Supervisory Body (OdV).

#### 5. Measurable Objectives

Fimo group establishes measurable qualitative objectives annually, which are regularly monitored through internal audits, third-party surveillance, KPIs, nonconformity analysis, and customer feedback. These objectives are communicated throughout the organization and serve as a concrete guide for improving company performance. The indicators are defined according to the SMART model (Specific, Measurable, Achievable, Relevant, Time-bound) and cover the following areas:

- Customer satisfaction
- Product/service quality
- Supplier performance
- Internal efficiency
- Safety and environment

## 6. Compliance, Responsibility and Reporting

- **Compliance Obligations:** we ensure compliance with all applicable regulations in the fields of quality, environment, safety, and social responsibility. We actively monitor regulatory changes and ensure that our processes are updated accordingly. (Integrated Company Audit).
- **Sustainability Reporting:** FI.MO.TEC S.p.A. is committed to publishing its annual sustainability report. Using the Reporting21.com platform, data is collected and analyzed with accuracy, ensuring efficient information management and high-quality reporting.
- **Environmental Materiality Analysis:** The company has conducted an environmental materiality analysis to identify priority topics based on its context, generated impacts, and stakeholder expectations.
- **Effects of Climate Change:** The company is conducting a climate risk analysis as part of its ESG reporting and initial impact materiality assessment. The analysis highlighted that rising temperatures could negatively affect employee health due to heat exposure, especially for those involved in industrial processes. Moreover, increased thermal stress and more frequent heatwaves may reduce worker productivity due to heat-related illnesses.

## 7. Support for the Integrated Management System

- **Resources and Investments:** we allocate adequate resources for maintaining and improving the Integrated Management System.
- **Continuous Training:** we provide training and professional development to ensure the necessary skills across all management areas. Training programs include technical, operational, and behavioral aspects to support employees' professional growth.
- **Technological Support:** we invest in digital tools and technologies to improve performance, operational efficiency, and communication across departments.

## 8. Stakeholder Engagement


- **External Communication:** we communicate openly with stakeholders about our commitments and results in quality, environment, safety, and equality. Transparency is the foundation of our stakeholder relationships, and we promote dialogue to enhance our social responsibility.
- **Collaboration and Initiatives:** we collaborate with customers, suppliers, and communities to promote sustainable and inclusive practices. We participate in industry networks (e.g., API) and cooperative projects to encourage knowledge sharing and develop innovative, sustainable solutions.



## 9. Policy Approval

This Integrated Company Policy has been approved by Top Management and is communicated to all employees and made available to interested parties. It will be periodically reviewed to ensure its adequacy and effectiveness. In the event of significant changes in operational or regulatory conditions, the policy will be updated to reflect such changes and ensure its ongoing relevance.

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**FI.MO.TEC S.p.A.**  
Via Belvedere, 11  
20861 BRUGHERIO (MB)  
Luca Tamperi  


CEO