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INTEGRATED CORPORATE POLICY

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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.

2. Introduction

FIMO Group is an international industrial organization 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 leading operators and system integrators in the sector, with a particular focus on the reliability, durability, and technical innovation of our products. The Group is committed to fostering a corporate culture that integrates quality, environmental stewardship, occupational health and safety, social responsibility, and gender equality. The company is dedicated to operating ethically and sustainably, ensuring high quality standards in every production process.

This integrated policy reflects the organization's commitment to conducting its activities responsibly, with a focus on customer satisfaction, environmental protection, employee safety and well-being, and the promotion of an inclusive and respectful workplace.

Our mission is to deliver high-quality products and services in full compliance with regulations and the expectations of the community and stakeholders, thereby contributing to sustainable and responsible development.

3. Purpose and Objectives

The Integrated Management System ensures that all Group activities are carried out in compliance with the following principles:

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

- Promotion of gender equality and inclusiveness, fostering a work environment in which every individual can fully express their potential.
- The actions and objectives defined in this Integrated Corporate Policy are consistent 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 changes, and develop solutions that effectively and precisely address the technical and operational challenges they face. Customer satisfaction is a key indicator of our success.
- **Innovation and Continuous Improvement:** We constantly invest in research and development, process digitalization, and training our people to enhance the quality of our products and business processes. Every report of nonconformity is considered an opportunity for improvement.
- **Quality in Design and Production:** We apply rigorous engineering methodologies and validation processes in the design of our components, ensuring that every product meets industry standards and international regulations. Each 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 regulatory requirements (e.g., ISO 9001), as well as with specific standards required by our customers or target markets.
- **Culture of Responsibility:** Every employee of the Group FIMO, regardless of role or location, is responsible for the quality of their work. We promote a culture of engagement and accountability, encouraging the active contribution of all in improving the effectiveness of our Integrated Management System.

4.2 Environmental Protection

- **Emissions Reduction:** We monitor and reduce greenhouse gas emissions and other pollutants through optimized processes and the use of clean technologies. We prioritize the purchase of low-environmental-impact company vehicles.
- **Waste Management:** We promote waste separation and the use of recyclable materials, both in production processes and in packaging.
- **Resource Efficiency:** We continuously improve energy and water efficiency.

- **Circular Economy:** We are committed to following the principles of the circular economy, promoting design for recycling and product reuse at the 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, with a focus on efficient resource use, durability, and end-of-life management.

4.3 Occupational Health and Safety and Legislative Decree 81/08

FIMO Group supports its decision to implement an organizational system that embraces the principles of safety, considering them essential components for improving the living conditions of its employees and the community. The company's identity is recognized in the way services are delivered to our customers, through processes that are efficient, effective, and compliant with the law. Identifying the context in which the company operates, and periodically reviewing it, makes it possible to clearly define the scope of action and business activities, as well as the related stakeholders. This approach enables a form of leadership that increasingly involves the various corporate functions, with particular and primary attention to the health and safety of workers.

- **Accident 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 have established an up-to-date Risk Assessment Document (RAD/DVR) and adopted registers for the use of Personal Protective Equipment (PPE/DPI), accident, and near-miss reporting, while maintaining a strong focus on the regular maintenance of machinery, equipment, and facilities.
- **Employee Involvement and Collaboration:** We are aware of the importance of maintaining a positive work environment where individuals are encouraged to actively participate. Our shared commitment and mutual support foster attitudes that can adapt to the changing needs of the context in which we operate. This mindset is reflected in each individual's proactive approach to anticipating potential risks and threats, implementing mitigation and improvement actions. We actively promote employee participation in health and safety initiatives by providing continuous training, regular updates, and the opportunity to report anomalies, nonconformities, or requests for clarification through a QR code linked to an anonymous online form. Every employee plays an active role in preventing and maintaining workplace safety, thereby contributing to building a corporate culture focused on health protection.

- **Smart Working and Work Flexibility:** We promote flexible working and smart working policies to improve employee well-being and support a healthy work-life balance.
- **Ethics:** Top Management places ethical values above all, with the protection of Workers' Health and Safety as the foremost priority. The health and safety of people are non-negotiable! Collective well-being is achieved through morally sound means that respect individual characteristics, organizational culture, and the interests and concerns of stakeholders. All staff are supported by Safety System Managers in developing awareness of the importance of adopting safe, honest, and fair behavior. Increasing attention is given to promoting our safety culture by referring to the procedures and operating instructions of the safety management system, with a focus on management involvement, improvement and risk management in occupational health and safety, the development and engagement of all employees, and the monitoring and control of health and safety performance indicators.
- **Professional Competence:** The level achieved to date is the result of constant commitment to continuous improvement. In product development, we adopt an approach aimed at providing solutions that ensure compliance with safety requirements and maintain, under all circumstances, conditions that safeguard the life and integrity of people. We continuously monitor and, when necessary, bridge any gaps between the skills required and those possessed by personnel, with the primary goal of protecting their safety and enabling them to perform at their best in carrying out work activities.

4.4 Social Responsibility and Gender Equality

- **Social Initiatives:** FIMO Group is committed to supporting non-profit organizations operating in the social and environmental fields.
- **Gender Equality:** We promote gender equality across all areas of the company, ensuring equal opportunities and combating all forms of discrimination. We are committed to raising awareness to create an inclusive work environment that values diversity and fosters mutual respect.
- **Working Conditions:** We respect human and labor rights, ensuring decent working conditions and a discrimination-free environment. We support the well-being of our employees through initiatives aimed at improving quality of work life and work-life balance. A dedicated recreational space has been set up in the offices.

4.5 Sustainable Supply Chain

- **Supplier Code of Conduct:** We collaborate with suppliers who share our values regarding quality, environment, safety, and social responsibility. Suppliers undergo periodic evaluations to verify compliance with our standards and to promote continuous improvements in their environmental and social performance (Vendor Rating).
- **Green Procurement:** We prioritize sustainable sourcing, favoring materials and suppliers with a low environmental impact. This approach allows us to reduce the environmental impacts associated with our supply chain and to promote the use of recycled materials and renewable resources.
- **Traceability and Due Diligence:** We implement material traceability systems and carry out due diligence activities to ensure respect for human rights within our supply chain, contributing to the social sustainability of our operations (Supplier Audit Checklists).

4.6 Talent Management and Skills Development

- **People Development:** We emphasize the continuous development of employee skills, offering training programs to address future challenges and the adoption of innovative technologies. We invest in internal talent to create a dynamic work environment ready to face market changes, also using professional skill development indicators. We have introduced the FIMO Academy, our training platform, which will undoubtedly make an important contribution to training across the entire Group.

4.7 Resilience and Risk Management

- **Risk Management:** Considering recent global challenges, we are committed to enhancing corporate 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 activities. We encourage responsible behavior and the adoption of sustainable practices.

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

- **Protection of personal data 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, and alteration, minimizing the data collected and processed and limiting it to what is necessary for carrying out business activities.
- **Use of encryption and firewall systems:** We have adopted security measures to prevent unauthorized access, such as the use of encryption systems and firewalls, along with procedures for managing data subject rights, ensuring their right to access, rectification, erasure, and objection to the processing of personal data.

4.10 Administrative Liability and Legislative Decree 231/01

- **Organizational Model:** The company has adopted an organizational model in compliance with Legislative Decree 231/01, duly approved by the Board of Directors.
- **Supervisory Body (OdV):** We have established a Supervisory Body (OdV) responsible for monitoring the implementation of the model and ensuring compliance with regulations.
- **Periodic Employee Training:** We have increased training on the provisions of the model and the behaviors to be adopted to prevent the risk of committing offenses.
- **Whistleblowing System:** We have implemented a whistleblowing system that guarantees anonymity and protection for those who report unlawful conduct.

4.11 Ethics and Anti-Corruption

FIMO Group recognizes that integrity, transparency, and business ethics are fundamental pillars to ensure stakeholder trust, business continuity, and corporate reputation.

- **Zero Tolerance:** For this reason, the company adopts a zero-tolerance policy towards 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 expected behaviors and those not tolerated.
- **Training and Awareness:** The Group promotes a culture of ethics through periodic training activities for all staff, focusing on anti-corruption, conflicts of interest, and individual responsibility.

- **Confidential Whistleblowing System:** A secure and confidential channel is available for reporting unlawful or unethical conduct, including anonymously. Reports are handled confidentially, ensuring whistleblower protection against possible retaliation.
- **Internal Controls and Audits:** The company carries out periodic audits on sensitive processes, particularly in procurement, business relations, gifts, travel, and sponsorships, to prevent or detect 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, under the supervision of the Supervisory Body (OdV).

5. Measurable Objectives

FIMO Group annually establishes measurable quality objectives, which are regularly monitored through internal audits, external inspections, KPIs, nonconformity analysis, and customer feedback. These objectives are communicated throughout the organization and serve as a concrete guide for improving business performance.

Indicators are defined according to the SMART model (Specific, Measurable, Achievable, Relevant, Time-bound) in relation to 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 regarding quality, environment, safety, and social responsibility. We actively monitor regulatory changes and make sure to update our processes to always remain compliant (integrated company audit).
- **Sustainability Reporting:** FIMO Group is committed to preparing its annual sustainability report. Thanks to the use of 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 carried out an environmental materiality analysis to identify priority issues based on its context, the impacts generated, and stakeholder expectations.

- **Climate Change Effects:** The company is conducting a climate risk analysis within the ESG reporting process and as part of its first impact materiality assessment. The analysis showed that rising temperatures could negatively affect employee health due to high heat exposure, especially for those involved in industrial processes. Moreover, thermal stress and more frequent heatwaves may reduce worker productivity because of illnesses caused by unusually high temperatures.

7. Support for the Integrated Management System

- **Resources and Investments:** We allocate adequate resources to maintaining and improving the Integrated Management System.
- **Continuous Training:** We provide training and professional development to ensure the necessary competencies in 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 enhance performance, operational efficiency, and communication across the various company departments.

8. Stakeholder Engagement

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

9. Policy Approval

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

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Luca Tamberi
FI.MO.TEC S.p.A.

Via Belvedere, 11
20861 BRUGHERIO (MB)



CEO

FI.MO.TEC. SpA

Via Belvedere 11 – 20861 Brugherio (MB) – Italy - Tel. +39 039 2899311

E-mail: fimo@fimoworld.com

www.fimoworld.com

R.E.A. N. 1052835 Milano – Capitale sociale: € 12.022.847,00 int. Versato

Codice Fiscale, Partita IVA e N. Registro Imprese di Milano 05954970157

Sede legale: Corso Italia 22 – 20122 Milano - Italy

Sedi operative: Via Belvedere 11 – 20861 Brugherio (MB) – Italy

Tel: +39 039 2899311

Via Campobello 34 / A – 00071 Pomezia (RM) - Italy

Tel. +39 06 91627024

