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**POLICY**

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**1. PREAMBLE**

AD, on the basis of the experience gained in the management of the quality system since 1997, confirms the need to impose itself on the market thanks to the high quality and high level of the products/services offered, aware that the increased competition in the sector requires the achievement of high quality levels in its services.

The company has also made a commitment to operate consistently with the principles of the PAS 24000 standard through transparent methods and systems aimed at surveying and meeting the expectations of its main stakeholders: customers, suppliers and employees.

The coherence of the Social Responsibility Policy with current corporate strategies is assessed by the Management and periodically reviewed for consistency with corporate logic.

**2. STRATEGIES AND OBJECTIVES**

The quality of products/services is a decisive aspect for every company, just as respect for the environment in which the company operates is a priority. That is why SIR has defined the following general strategies from which the objectives are derived in a special document 'QUALITY, ENVIRONMENTAL AND SAFETY OBJECTIVES', linking them to objective indicators for their measurement.

In general, by adopting an integrated quality, environment and safety management system, SIR pursues the following general strategies:

- Continuous improvement of the company processes and products;
- Compliance with the mandatory regulation for the production and marketing of medical devices;
- Striving for maximum customer satisfaction;
- Satisfying and safeguarding the health and safety of internal personnel;
- Achievement of satisfactory operational and economic results;
- Improvement of SIR's corporate image towards the outside world;
- Compliance with applicable Laws/Regulations and punctual implementation of prevention and protection measures;
- Monitoring the consumption of energy and natural resources in order to avoid wastage where possible and using alternative energy sources whenever possible;
- Prevention and reduction of pollution due to atmospheric emissions, waste and noise by directly implementing and also enforcing the provisions of the integrated management system on suppliers;



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- Maintaining a high level of communication with the outside world, assessing from time to time the most appropriate actions to raise awareness of the environmental effects of its suppliers' activities;
- Progressive and constant improvement of workers' health and safety conditions through ever greater coordination between the subjects (DL, MC, RSPP, RLS, Supervisors) who have the responsibility and the task of guaranteeing, improving, presiding over the safety of the company's workers.

These strategies are translated into achievable short-term goals annually at the Management Review, which can be measured by means of a set of indicators in the document 'Planning Objectives'.

In addition, sales targets linked to a certain reward system are periodically set for agents. These objectives are communicated by means of internal circulars.

With PAS 24000 certification, and the associated continuous improvement project, Management has formally assumed responsibility for the following commitments:

- comply with national, EU and international labour and workers' rights laws, and comply with the provisions contained in official documents and their interpretations;
- maintain social responsibility requirements over time and adapt to any new requirements;
- ensure the periodic monitoring and continuous improvement of the implemented social management system by defining, within the framework of the meetings of the established Social Committee, specific improvement objectives and verifying their attainment also through a panel of significant indicators;
- ensure that all personnel receive adequate training and information on ethics and social responsibility;
- raise awareness among suppliers of the social responsibility principles of the PAS 24000 standard;
- carry out first-party audits to ascertain compliance with social requirements, then take any necessary corrective and improvement actions;
- document and communicate to stakeholders the commitment to Corporate Social Responsibility also through the preparation of the annual Social Report.

### 3. TOOLS

In order to achieve the objectives in line with the planned strategies, AD decided to maintain a management system within its structure that complies with the principles of UNI EN ISO 9001, UNI EN ISO 14001, UNI EN ISO 45001 and PAS24000.

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The management system uses system review and internal and third-party audits as tools to monitor its effectiveness, suitability and adequacy.

**4. THE MANAGEMENT REPRESENTATIVE**

AD confirms the appointment of a representative (Integrated Quality and Environment System Manager) who, irrespective of other responsibilities, has the authority and responsibility to ensure that system processes are prepared, implemented, and kept up-to-date and that awareness of customer requirements is disseminated within SIR.

RSG will keep AD informed about the performance of the Management System and the needs for improvement.

The Management Representative for PAS 24000 was appointed and the Workers' Representative for PAS 24000 was elected.

The Social Management Committee was established as the body to implement and monitor the PAS 24000 Management System.

**5. THE PERSONNEL**

This Declaration is disseminated to all company personnel through special awareness-raising meetings, in which all personnel participate, and through the distribution of this document.

All SIR personnel are responsible for implementing the requirements in their areas of responsibility.

The requirements of Annex A of PAS 24000 and the commitments made by our company are listed below.

<b>Requirements ANNEX A of PAS 24000 Standard</b>	<b>The organisation's commitment</b>
<b>A.1- HUMAN RIGHTS POLICY</b>	
1. An inventory is made of the risks related to human rights.	A procedure has been foreseen and implemented to ensure that all risks in relation to the Social Management System are addressed, which also includes the risk of non-compliance with human rights. The risk assessment is reviewed at least once a year or if the organisation faces new risks or if social performance indicators deteriorate.
2. The organisation's activities do not cause negative impacts on human rights. Impacts that occur are addressed.	Our organisation operates in full compliance with mandatory human rights Laws and Regulations. In the event of any complaints and/or non-conformities, our organisation has established a procedure to respond promptly through corrective actions.
3. The organisation's activities do not cause negative impacts on human rights. Impacts that occur are addressed.	Our organisation operates in full compliance with mandatory human rights Laws and Regulations. In the event of any complaints and/or non-conformities, our organisation has established a procedure to respond promptly through corrective actions.
4. A human rights due diligence process is established, implemented and maintained to identify, prevent, mitigate and account for how the organisation addresses its impacts (including the impacts of its suppliers) on human rights, and processes to remedy any negative human rights impacts caused by or contributed to by the organisation. This due diligence process aims to avoid adverse human rights impacts directly related to the organisation's activities, products or services and to prevent or mitigate any adverse human rights impacts in its business dealings, even if the organisation has not contributed to those impacts.	When assessing risks, our organisation first performs due diligence on internal human rights management and that of suppliers with a higher than low risk of human rights compliance.
<b>A.2- FORCED LABOUR</b>	
1. The organisation does not engage in, support or tolerate employment by force or coercion. All workers (including prisoners) start voluntarily and may terminate their employment with reasonable notice.	Under any circumstances, we do not require cash deposits or original identity documents from hired personnel. We do not use cameras or surveillance to monitor workers in the performance of their duties.
2. The organisation does not force any person to work under the threat of a penalty or sanction.	We reject any form of coercion against

<p>3. No personal documents or other valuables of workers, such as work permits or travel documents, are retained, nor are they required to deposit them with the employer and/or recruiter.</p>	<p>personnel. Working hours and breaks are communicated transparently when signing the employment contract with our organisation.</p>
<p>4. No fees or related costs are charged (directly or indirectly, in whole or in part) to applicants and workers for services directly related to recruitment or employment that may lead to situations of forced or compulsory labour.</p>	<p>Where employment agencies are used in the recruitment of personnel, we verify that the practices adopted comply with the requirements concerning forced labour. No unlicensed intermediaries are used.</p>
<p>5. No monetary deposits, financial guarantees or collateral or personal assets are required as a condition of employment</p>	<p>Our company provides severance pay advances in accordance with the relevant legal provisions. Our company does not offer archiving of documents of employees who are obliged to keep them themselves.</p>
<p>6. Workers are not held in debt bondage or forced to work for an employer or any other entity to pay the debt</p>	
<p>7. If advances and loans are available to workers, there is a written policy on the terms and conditions, communicated to workers in a comprehensible manner. These terms (and the associated interest rates) are not used to bind workers to employment.</p>	
<p>8. If there is a secure storage option for personal documents and valuables: a) it is the workers' choice to use the storage; b) storage records are kept; and c) workers have free access to their goods.</p>	
<p>9. When employment agencies or contractors are used, these agencies are required to: a) comply with the applicable national legal requirements; b) be authorised or certified by the competent national authority, if applicable; c) comply with the requirements of Table A.2 on forced labour and recruitment commissions; and d) not engage in fraudulent or corrupt recruitment practices</p>	
<p>10. The organisation does not restrict the freedom of movement of workers. The organisation does not require workers to stay at the workplace after working hours, nor does it confine them to any workers' accommodation.</p>	
<p>11. If instances of forced or compulsory labour are found, the organisation implements an effective remedy, such as compensation for personal and material damage. Remedial actions taken are verified and recorded, the remedial plan is documented and actions are put in place to prevent recurrence.</p>	

<b>A.3- CHILD LABOUR</b>	
1. The organisation complies with the minimum	Our company follows the existing jurisdictional

<p>working age, which must not be less than 15 years or the minimum age defined by the applicable legal provisions or the age of completion of compulsory education, whichever is higher.</p>	<p>principles. The principle for access to employment is that the child must have completed compulsory schooling. The current school reform law provides for an education period of 10 (TEN) years, consisting of:</p>
<p>2. Details are given of any children under the age of 15 working at the site</p>	<p>5 years of primary school; 3 years of middle school; 2 years of high school.</p>
<p>3. When the organisation applies labour for training/apprenticeship programmes, these are not exploited and are in line with national legal requirements</p>	<p>The child is therefore able to start work after reaching the age of 16, regardless of whether he or she is still in compulsory education.</p>
<p>4. The organisation does not employ workers under the age of 18 at night or in dangerous conditions.</p>	<p>There is, however, the possibility of starting work at the age of 15 if the person in question:</p>
<p>5. The organisation establishes age verification mechanisms for all workers and maintains valid age verification records</p>	<p>1-adheres to the innovative teaching method of school-work alternation; 2-signs an apprenticeship contract aimed at obtaining a professional qualification.</p>
<p>6. The organisation ensures that, if child labour is found, effective remedial procedures are put in place that put the best interest of the child first. The repair plan is documented and verified and actions are put in place to prevent recurrence</p>	<p>A procedure is planned and implemented to ensure that:</p> <ul style="list-style-type: none"> <li>- no employee under the age of 16 is employed;</li> <li>- knowledge of its ethical policy is disseminated to both employees and stakeholders</li> <li>- monitoring is implemented on our suppliers with higher than low risk in order not to become complicit in the exploitation of child labour.</li> <li>- in the case of apprenticeships, internships, school-work alternation, a company tutor is assigned to check that the activities are carried out in compliance with the applicable legal requirements;</li> </ul>

**A.4- FREEDOM OF ASSOCIATION**

<p>1. Workers have the right to join or form trade unions or other workers' organisations of their choice - or to refrain from doing so - and to bargain collectively in accordance with applicable national legal requirements</p>	<p>We guarantee all workers in our company:</p> <ul style="list-style-type: none"> <li>- respect for trade union rights;</li> <li>- the prevention of any form of discrimination against union members or representatives.</li> <li>- the involvement of all workers through the establishment of the Social Management Committee</li> </ul>
<p>2. Workers' representatives or trade union members are not discriminated against or otherwise penalised because of their membership or affiliation to a trade union or workers' organisation, in accordance with applicable national legal requirements</p>	
<p>3. Workers' representatives duly elected by trade unions and other organisations of the workers have access to the workplace to perform their representative functions in compliance with applicable national legal requirements</p>	
<p>4. Where there are no legal protections for the right to collective bargaining or freedom of association, the organisation involves workers through alternative and legal mechanisms, where</p>	

possible, to enable workers' representatives to engage in dialogue on workplace issues	
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<b>A.5- DISCRIMINATION/EQUAL TREATMENT OF WORKERS</b>
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<p>1. Equal opportunities and treatment in employment and occupation are respected. Workers, including temporary and part-time workers and contractors, are not discriminated against in recruitment or employment practices on the basis of characteristics protected by law and personal characteristics that do not interfere with a worker's ability to perform a specific job</p> <p>2. The organisation does not engage in, support or tolerate the use or threat of corporal punishment, mental or physical coercion, bullying, harassment, including sexual harassment, or abuse of any kind.</p> <p>3. Written disciplinary procedures are in place and effectively communicated to all workers.</p> <p>4. All disciplinary measures are recorded.</p>	<p>Recruitment of personnel is done on the basis of skill, experience and education regardless of gender, social class, national origin, caste, birth, religion, disability, sexual orientation, family responsibilities, marital status, union membership, political opinion, age or any other condition that could lead to discrimination. Contractual grading takes place in full compliance with the applicable National Collective Labour Agreement and on the basis of the tasks actually performed within the organisation. Wages are calculated according to the employee's contractual level in application of the National Collective Labour Agreement.</p> <p>Education and training are guaranteed to all workers; career advancement takes place according to the abilities of individual workers and the organisational needs of the company. Dismissals are made only in cases permitted by law.</p> <p>We reject all disciplinary practices not provided for in the National Collective Labour Agreement and the STATUTE OF WORKERS. If unavoidable, we simply apply disciplinary sanctions as provided for in the National Collective Labour Agreement, in order to maintain rules of correct conduct towards customers, colleagues and management.</p> <p>Workers are made aware of what disciplinary measures can be taken in the event of non-compliance with the provisions laid down in the employment contract in accordance with the applicable National Collective Labour Agreement.</p>
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<b>A.6- OCCUPATIONAL HEALTH AND SAFETY</b>
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<p>1. Occupational health and safety is an integral part of the SGS.</p> <p>2 Safety, health and cleanliness conditions are guaranteed in all workplaces, including workers' accommodation and other facilities provided or prescribed.</p> <p>3 Health and safety training is provided promptly and repeated regularly, when new workers are recruited or re-employed and when changes in the process or machinery present new risks.</p> <p>4. Health and safety training is provided according to</p>	<p>Ensuring safety in the workplace is our duty, therefore:</p> <ul style="list-style-type: none"> <li>- we have complied with the obligations imposed by occupational health and safety and related laws regarding the assessment of all workplace risks;</li> <li>- we have appointed the Head of the Prevention and Protection Service, the Company Doctor and the company supervisors;</li> <li>- we guarantee the possibility for workers to elect a Workers' Safety Representative;</li> </ul>
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<p>the needs of all workers, is easily understood, is free of charge and takes place during paid working hours.</p> <p>5. Written records are kept of all health and safety incidents in the workplace and other facilities, as required or requested.</p> <p>6. Causes of health and safety incidents are determined when they occur and appropriate corrective action is taken to prevent similar incidents from recurring</p> <p>7. Adequate and effective personal protective equipment (PPE) is provided free of charge. PPE is serviced and replaced if necessary. Workers are instructed on their correct use and monitored</p> <p>8. In the event of accidents or incidents in the workplace, clear provisions are in place to provide first aid and medical assistance</p> <p>9. All workers are provided with free drinking water and clean toilets.</p>	<ul style="list-style-type: none"> <li>- we have scheduled a specific information session on safety risks and the delivery of information material ex art. 36 Italian L.D. 81/08 as amended to new recruits before they can start work;</li> <li>- we carry out periodic training for all personnel pursuant to Art. 37 Italian L.D. 81/08 as amended during working hours;</li> <li>-all workers are required to undergo a preventive medical examination before starting work and at the required intervals for periodic monitoring;</li> <li>- we have provided and provide free personal protective equipment to all workers;</li> <li>- we have appointed First Aid Officers;</li> <li>- we have appointed Fire Prevention Officers;</li> <li>- we have a contractual relationship with qualified companies for all maintenance work to keep facilities, vehicles and work equipment safe.</li> <li>-in the event of accidents, these are recorded and reported to INAIL (Italian National Institute for Insurance against Accidents at Work) within the timeframe required by law. We carry out root cause analysis and with the support of the Prevention and Protection Service, identify corrective actions to ensure that they do not recur in the future.</li> <li>- we have set up a specific operating procedure for the management of health and safety requirements in the workplace;</li> <li>- we have established an operational procedure for handling all emergencies that may occur in the workplace and we carry out at least one simulation per year to verify the effectiveness and understanding of the procedure by all workers.</li> <li>-we provide all workers with access to clean drinking water and clean, tidy toilets.</li> </ul>
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<b>A.7- BUILDING SAFETY</b>	
<p>1. Emergency exits, escape routes, fire-fighting equipment and fire alarms are adequately marked in accordance with national and industry standards. Emergency exits and escape routes are open, accessible and unobstructed to allow safe evacuation in the event of an emergency.</p> <p>2. Fire equipment and fire alarms are tested or inspected in accordance with applicable national or industry legal requirements</p> <p>3. Appropriate measures are taken to assess and monitor the strength, stability and safety of buildings and equipment, including workers' housing, where</p>	<p>The precepts of the fire regulations in force at the time are complied with in all workplaces. The management of fire-fighting equipment was contracted out to a company after evaluation of technical and professional suitability. Monthly internal periodic inspections are carried out by fire-fighting officers. All installations, equipment and facilities are checked in order to monitor and ensure the safety of the buildings.</p>

provided or required. If necessary, corrective measures are taken.	
4. If accommodation facilities are planned or required, they are located separately from production or storage facilities	

**A.8- LABOUR AND CONTRACTUAL RELATIONS**

1.Workers are informed of their working conditions in writing and in a comprehensible manner prior to employment	
2.The work is performed by persons with a verifiable formal employment relationship in accordance with applicable national legal requirements	
3.No labour agreements are used to avoid obligations to workers under national labour and social security laws	
4.The remuneration for standard working hours meets or exceeds the minimum wages stipulated by law, industry standards or collective labour agreements (where applicable).	
5.Wages are paid regularly, promptly and in full. All payments are made directly to the employee in legal tender or to a bank account in his/her name	
6.When establishing a rate of pay for production, quota or piece-rate, the organisation shall allow workers to earn at least a wage that meets or exceeds applicable legal minimum wages, industry standards or collective bargaining agreements (where applicable) within standard working hours	
7.All workers are compensated for all overtime as required by applicable national legal requirements or by a collective labour agreement, whichever offers greater benefits or protection to workers	
8.Each time they are paid, all workers receive clear and written details of their salary for the pay period in question	
9.No deductions are made from wages unless permitted by applicable national legal requirements or a collective agreement. Workers are informed of any deductions in writing and in a comprehensible manner	
10.No salary deductions are made as a disciplinary measure	
11.All benefits and grants provided by law are provided to all workers	

Our company proceeds to classify its workers in accordance with the applicable National Collective Labour Agreement, through the formalisation of the employment proposal in writing, where the agreed conditions for the required work to be executed are set out in a comprehensible manner.

All workers are employed regularly with the required notifications to the various authorities within the timeframe stipulated by law.

The agreed remuneration is in accordance with the salary scales set out in the applicable National Collective Labour Agreement for the task and level assigned.

Wages and salaries are paid by the 10th day of the month following the work to be executed, by bank transfer, exclusively to the bank account in the employee's name.

Should the company request overtime from its workers, the overtime hours may never exceed the maximum number of hours stipulated in the applicable National Collective Labour Agreement. All overtime hours are regularly accounted for and paid according to the terms and conditions of wage and salary payments.

By the 10th day of the month following the work to be executed, the employee receives a pay slip detailing the amounts, including deductions.

The company does not apply payroll deductions to follow up a disciplinary measure.

If a worker has applied for benefits under the law, our company follows up the application with the relevant bodies without delay.

**A.9- WORKING HOURS**

Standard working hours comply with national legal requirements, collective agreements or industry standards, but do not exceed 48 hours, excluding overtime	Our company adapts working hours and the possibility of requesting overtime, as well as the regulation of breaks, rest days and paid leave to the National Collective Labour Agreement applied in the company. The HR department monitors all workers' entitlements, such as overtime, unused holidays, unused leave, in order to be able to plan with them the correct use of entitlements on the one hand and to monitor that overtime is not worked beyond the hours stipulated in the applicable National Collective Labour Agreement. Overtime is not required on a regular basis, but only to meet peaks in activity and not on a structural basis.
Where applicable national legal provisions establish exceptions to the total working hour limit (60 hours per week, including overtime), appropriate protection measures are taken to protect the health and safety of workers	
When the total working hours exceed 60 hours per week, including overtime, the total hours worked are reported	
Overtime agreed with workers and overtime requirements do not involve forced labour.	
Overtime is not regularly required	
All workers are entitled to breaks during their shifts	
Workers are entitled to at least one day off of 24 consecutive hours per week	
Where applicable national legal requirements establish exceptions to the minimum number of rest days, appropriate protection measures are taken to protect the health and safety of workers. As a minimum, workers are granted two rest days, each of 24 consecutive hours, within a 14-day period	
Workers are granted paid leave (public and annual holidays, maternity/paternity leave, sick leave, etc.)	

**A.10- GRIEVANCE MECHANISM**

A written procedure has been established to address complaints or concerns. The grievance mechanism is accessible to all workers and external parties.	Our company has set up a specific procedure for the management of incidents, complaints and non-conformities in order to manage any adverse social responsibility events effectively and quickly. In addition, an internal anonymous reporting channel was made available through a reporting box that allows for anonymity in reporting. In the case of named reports, they are taken over by the Social Management Committee, which is bound by confidentiality on the matter. No whistleblowers are retaliated against for reports made.
Confidentiality of any complaint raised is guaranteed and information is only disclosed if necessary to investigate and handle the complaint	
No employee or external party who files a complaint in good faith suffers retaliation	

**A.11- BUSINESS ETHICS**

The organisation is not and will not be involved in any act of corruption, extortion, embezzlement or any form of bribery, either directly or indirectly	A code of ethics is in force in the company and it is to be signed by all workers and, in general, all external stakeholders. All corporate information disclosed is true.
The organisation does not falsify any information concerning its activities, structure and performance and is not involved in any act of misrepresentation in	



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The PAS 24000 Policy and Standard are clearly and visibly displayed in an appropriate and understandable form both in the workplace and on the specific section of the company website.