



INTEGRATED POLICY

Rev. No. 8 dated 19/03/2025

1. INTEGRATED POLICY

1.1 *General Principles*

Itinera S.p.A., a company operating in international markets in the construction of infrastructure, civil and industrial works, aligns its business with the voluntary standards ISO 9001:2015, ISO 14001:2015, ISO 50001:2018, ISO 45001:2018, ISO 31000:2018, ISO 39001:2016, SA 8000:2014 and ISO 30415:2021 and UNI PdR 125:2022. These standards support strategic directions, process management, risks and opportunities, as well as the minimisation of environmental impacts, the protection of workers and communities, while providing a framework for setting corporate objectives. Itinera S.p.A is committed to operating in Italy and around the world with integrity, respect for ethical standards and social responsibility, in accordance with a development model that is also sustainable for stakeholders.

This Integrated Policy establishes the framework for promoting and strengthening compliance with all the principles expressed in Itinera's specific policies. The objective is to provide operational tools to the Group's companies to implement processes in accordance with the main international standards in the areas of quality, safety, environment and energy, human rights, sustainability, diversity and inclusion, and gender equality. It consistently reaffirms and integrates the principles already set out in the Code of Ethics and Conduct, the Organization, Management, and Control Model (pursuant to Legislative Decree No. 231/2001), the Social Responsibility Management Manual SA8000:2014, as well as all company policies and procedures currently in force.

The purpose of this Integrated Management System Policy (hereafter 'Integrated Policy') is to promote awareness, knowledge and application of the Integrated Management System by disseminating a culture of continuous improvement to all internal and external stakeholders.

This policy applies to Itinera S.p.A. and all its subsidiaries in Italy and abroad, unless otherwise specified, and represents a benchmark in terms of the values and principles it contains.

The Management is committed to:

- implementing and maintaining governance that is appropriate to the organisation's purpose and context and which supports its strategic directions;
- meeting and, where possible, exceeding regulatory obligations, requirements of voluntary reference standards, and the needs and expectations of Stakeholders;
- ensuring full compliance with the principles of the Code of Ethics and Code of Conduct, the Organisation, Management and Control Model pursuant to Legislative Decree No 231/2001 and company policies by all internal and external stakeholders;
- periodically evaluating the achievement of all the objectives established in the areas of Quality, Sustainability, Environment, Energy, Health and Safety, Road Traffic Safety, Social Responsibility, Diversity and Inclusion, and

Gender Equality and those indicated in other relevant corporate policies, by identifying margins for improvement and redefining objectives accordingly;

- assessing all potential risks tied to business processes, prioritising preventive measures and internal audits for eliminating and, where this is not achievable, reducing the probability of accidents, injuries and non-conformities, etc.);
- ensuring the involvement and participation of all company personnel by making them aware of the Integrated Management System so this can be shared, implemented and maintained over time;
- incorporating sustainability principles and climate action into all business operations, committing to driving change towards a more sustainable future and creating an environment where all employees can actively contribute to achieving our climate goals;
- promoting awareness and training activities for its employees, co-workers and suppliers in order to disseminate a broad awareness on sustainability, social responsibility and stakeholder satisfaction at all levels within the company, according to individual powers and responsibilities;
- establishing a value chain that is sustainable and integrates Corporate Social Responsibility principles into procurement decisions and processes, while ensuring that the requirements of the company and its stakeholders are met;
- establishing effective communication and information dissemination to internal and external stakeholders on Occupational Health and Safety, Environment, Energy, Social Responsibility, Diversity and Inclusion, and all ESG (Environmental, Social, and Governance) matters, through the distribution of corporate policies and the preparation and publication of the Sustainability Report;
- regularly monitoring and measuring sustainability performance and emission reductions to ensure transparency and accountability towards all stakeholders;
- continuously improving environmental performance through the adoption of innovative technologies, waste reduction, and process optimization, with the goal of contributing to a healthier environment and a more sustainable future.

Itinera S.p.A. is aware of its responsibility to generate lasting value that is shared with all stakeholders across the set of choices, actions, activities and projects it carries out as an organisation, and has expressed its commitment in the following areas in particular : Quality, Environment, Energy, Road Traffic Safety and Security, Social Responsibility and Diversity and Inclusion, through a new methodology involving a systemic and organic approach towards the creation of a sustainable business model.

The management of activities in accordance with the Integrated Management System supports Itinera S.p.A. in achieving the following SDGs:



1.2 *Regulatory References*

- UNI EN ISO 9001:2015 – Quality Management Systems
- ISO 9001:2015/Amd 1:2024 – Quality Management Systems - Requirements Amendment 1: Climate Action Changes
- UNI EN ISO 14001:2015 – Environmental Management Systems
- UNI EN ISO 45001:2023 – Occupational Health and Safety Management Systems
- UNI ISO 39001:2016 – Road Traffic Safety (RTS) Management Systems
- SA 8000:2014 – Social Accountability
- UNI ISO 30415:2021 – Diversity and Inclusion
- UNI PdR 125:2022 – Management System Guidelines for Gender Equality
- Anti-Corruption Policy
- Diversity and Inclusion Policy
- Environmental Policy
- Biodiversity Policy
- Supplier Code of Conduct

2. QUALITY

In the performance of its business activities, Itinera S.p.A. guarantees the adoption of a suitable, adequate and effective Integrated Quality Management System in compliance with ISO 9001:2015 with the aim of achieving a continuous improvement in performance and an approach characterised by risk management and the development of sustainability. Itinera pursues this through a commitment to:

- ensuring the necessary resources for the planning, implementation, control, monitoring and dissemination of its Integrated Quality Management System;
- guaranteeing the fulfilment of targets by periodically reporting and analysing performance, to identify margins for improvement and subsequently redefine targets, criteria and actions to be implemented;
- incorporating the principles of sustainability and climate action into our corporate vision, recognizing that our commitment to quality and the environment contributes to our long-term success and the creation of value for all stakeholders;
- respecting contract schedules defined with customers, through appropriate planning of activities;
- executing works in a manner that meets the quality levels defined in contracts with customers and, where possible, exceeding these, while quickly finding solutions to problems raised by customers and other stakeholders;
- making an appropriate selection of suppliers of products, processes and/or services to ensure the satisfaction of Customers and other Stakeholders, in the search for shared solutions, through the effectiveness and

efficiency of business processes and a comprehensive analysis of strategic and operational risks and opportunities in projects;

- constantly monitoring the market to identify innovative technologies, products and suppliers that will optimise the quality of its performance;
- integrating climate change goals as part of the overall quality objectives, enhancing alignment between quality and sustainability, contributing to a positive environmental impact, while simultaneously promoting operational efficiency and continuous improvement as a strategic opportunity to innovate and enhance operational performance;
- increasing quality performance through continuous improvement of its Integrated Quality Management System.

The management of Integrated Quality Management System activities supports Itinera S.p.A. in achieving the following SDGs:



3. SUSTAINABILITY, ENVIRONMENT AND ENERGY

In the areas of sustainability, environment, and energy, Itinera is actively involved in environmental protection and climate action, adopting sustainable solutions to reduce the environmental impact of its activities, continuously improving the management of climate change-related risks, and promoting ecological initiatives to contribute to a more sustainable future.

In terms of the environmental and Energy topics, Itinera S.p.A. is committed to promoting and raising awareness with regard to responsible business models, with particular reference to climate change mitigation and adaptation, a sustainable use of natural resources, prevention and reduction of pollution, protection and restoration of biodiversity and ecosystems, the transition towards a circular economy, proper waste management and a reduction of direct and indirect environmental impacts, a systemic and constant approach to the energetic efficiency through the management of related risks and in compliance with ISO 14001:2015 and ISO 50001:2018. This is done through a commitment to:

- ensuring the necessary resources for the planning, implementation, control, monitoring and dissemination of its Integrated Management System for the Environment and of its Energy Management;
- guaranteeing the fulfilment of targets that have been set, by adopting a suitable, adequate and effective Integrated Management System for Environment and Energy, periodically reporting and analysing performances, thereby identifying margins for improvement and subsequently redefining targets, and introducing specific energy targets established with the purpose of continuous improvement.
- criteria and actions to be implemented by adopting sustainable techniques and standards;

- making an appropriate selection of innovative technologies, products and suppliers in order to minimise possible impacts on the environment, following risk and opportunity assessments, an analysis of significant environmental aspects and direct and indirect impacts;
- improving environmental and Energy Performances, by promoting initiatives and activities aimed at reducing energy consumption within its organization and, where possible, with its customers, by prioritising the use of renewable energy, including in compliance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM, with a particular focus on the reduction of greenhouse gas and CO₂ emissions of Scope 1 and 2 and Scope 3 (for the purchase of goods and services), as validated by Science Based Targets;
- adopt management methods on the systems (its own and those of its customers, where possible) which, with the same result, can guarantee optimal use of energy;
- improving environmental performance, including in accordance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM, with particular attention to the protection of biodiversity and the preservation of habitats;
- improving environmental performance, including in compliance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM, with particular attention to the development of circular economy projects involving an increase in the percentage of reused or recycled waste;
- improving environmental performance by reducing consumption of natural resources, such as water, soil and raw materials;
- constantly monitoring the market to identify innovative technologies, products and suppliers, including in compliance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM aimed at increasing the percentage of investments in new projects certified according to EU taxonomy/sustainability standards;
- define and maintain active databases relating to the periodic consumption of the plants, sharing the summary documentation to the managers involved and constantly detecting behaviors that are consistent or not with the consumption reduction policy;
- ensure a widespread energy monitoring, and implement a plan to replace machines and systems aiming for greater energy efficiency, always keeping in mind a cost/benefit perspective in the medium and long term;
- meeting its compliance obligations by periodically mapping applicable regulatory, legal and compliance requirements;
- complying with all applicable environmental laws and regulations and, whenever possible, exceeding existing standards through voluntary initiatives that positively contribute to the health of our planet;
- analysing environmental incidents to identify corrective actions and training to create an environmental culture that minimises potential negative impacts;
- communicating transparently to all its stakeholders the management of environmental processes to ensure full cooperation with local communities while limiting impacts wherever possible;
- collaborating with suppliers, customers, and other stakeholders to collectively promote the adoption of eco-friendly practices and reduce environmental impact, thereby contributing to positive and collective change;

- increasing its environmental and Energy performances through a continuous improvement of the Integrated Quality Management System for the Environment;
- reducing greenhouse gas emissions and improving energy efficiency, promoting the responsible management of natural resources and the use of low-energy-consuming resources;
- spread greater awareness on the use of energy at all levels through communications and training/information activities, establishing and promoting "best practices" that involve all workers.

The management of the activities of the Integrated Management System for the Environment supports Itinera S.p.A. in achieving the following SDGs:



4. HEALTH AND SAFETY, RTS (Road Traffic Safety)

Itinera S.p.A. pursues the continuous improvement of the protection of the health and safety of people including the customers, which are the final users of the finished works, by eliminating, reducing or keeping under control dangers and risks to health and safety, preventing accidents and occupational diseases, with a commitment to regulatory compliance and exceeding, where possible, regulatory requirements and complying with the highest standards and industry best practices, such as ISO 45001:2018 and ISO 39001: 2016, with a commitment to:

- guaranteeing the necessary resources for the planning, implementation, control, monitoring and dissemination of the Integrated Management System in the fields of Health and Safety and Road Traffic Safety;
- guaranteeing the fulfilment of targets by adopting a suitable, adequate and effective Integrated Management System for Health and Safety, periodically reporting and analysing performance, thereby identifying margins for improvement and subsequently redefining targets, criteria and actions to be implemented;
- improving Health and Safety standards, by undertaking to achieve a zero accident target through the pursuit of the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM concerning the reduction of the rate of accidents recorded at work and zero deaths due to accidents at work;
- meeting its compliance obligations by periodically mapping applicable regulatory, legal and compliance requirements;
- consulting and involving workers and workers' representatives in the development, planning, implementation, evaluation of performance and improvement actions in the Integrated Management System for Health and Safety;
- analysing the causes of any accidents, near misses, road accidents or emergencies to prevent their recurrence;

- promoting the growth of the safety culture of all personnel by means of appropriate education and training, where possible going beyond the level required by mandatory regulations;
- eliminating hazards and reducing risks to workers' health and safety by employing staff that is qualified and appropriately trained for assigned tasks and roles;
- promoting corporate best practices for the dissemination of a safety culture among internal and external stakeholders in workplaces, including with the involvement of the supply chain;
- guaranteeing healthy working conditions and a safe working environment, including by ensuring regular maintenance of its vehicles and machinery and by encouraging preventive checks to ensure maximum reliability;
- disseminating Road Safety objectives within the company and promoting staff involvement to more effectively prevent road accidents, including serious injuries, that may occur with company vehicles;
- encouraging staff to intervene whenever health and safety is put at risk by unsafe processes and/or behaviour;
- increasing its Health and Safety and RTS performance through a continuous improvement of the two Management Systems.

The management of the activities of the Integrated Management System for Health and Safety and RTS supports Itinera S.p.A. in achieving the following SDGs:



5. SOCIAL RESPONSIBILITY, DIVERSITY AND INCLUSION, GENDER EQUITY

In the ethical and social sphere, Itinera S.p.A. considers people to be the most important resource for creating value within the organisation, and a key factor for its success.

Through the implementation of its Human Rights, Diversity and Inclusion Policies and this Integrated Policy, Itinera S.p.A. defines the responsibilities, criteria and methods for guaranteeing the protection of the rights of individuals and the health and integrity of employees, co-workers, suppliers and the local communities in which it operates. It is formally committed to operating under the Integrated Management System in compliance with the requirements of the SA8000:2014 and ISO 30415:2021. UNI PdR 125:2022 standards, and to:

- support the values of diversity, inclusion and gender equality through the adoption of corporate, organizational and management mechanisms focused on the respect of the rights, freedom and dignity of people, through an approach based on impartiality without any form of direct or indirect discrimination in relation to gender, age, sexual orientation and identity, disability, state of health, ethnic origin, nationality, political opinions, social category to which one belongs and religious faith;

- promote the conditions that allow the removal of cultural, organizational and material obstacles that limit the full expression of people and their complete valorization within the organization, committing to communicating internally and externally its desire to pursue gender equality and to enhance diversity;
- preserve the value of its staff and promote the protection of their psychophysical, moral and cultural integrity through working conditions that respect individual dignity and behavioral rules;
- stimulate an inclusive, collaborative, supportive working environment open to contributions from all male and female employees to increase the trust of people, customers and, in general, civil society.
- protecting and enhancing the human resources it uses, by promoting the professional growth of each individual, involving workers and their representatives in decisions concerning health and safety, and refraining from using or facilitating child and forced labour and actively combating this, while complying with all reference standards, including national and supranational standards on worker protection, ILO conventions, and the principles of social responsibility;
- ensuring fair, dignified treatment and compliance with the minimum contractual standards set by the regulations of the countries in which it operates, regarding compensation for each employee;
- establishing a system of ethically sustainable suppliers and supplies;
- ensuring a safe and healthy working environment, the right to freedom of association and collective bargaining;
- disseminating, making understood and respected the principles of social responsibility by its employees, business partners, supply chain participants and all internal and external stakeholders, and promoting their participation;
- prosecuting any offence against individuals such as: harassment, bullying, discrimination, violence in the workplace, persecution, mobbing, mistreatment of employees, threats, trade union offences and offences against freedom of association;
- promoting the active involvement of workers in the continuous improvement of the SA8000 system, by maintaining a balanced and cross-sectional representation of the workforce in the Social Performance Team;
- promoting the protection of human rights, including in compliance with the objectives set out in the Sustainability Plan 2022-2026 by the parent company ASTM, with particular attention to increasing the number of employees involved in training on business ethics;
- contributing to the development of local communities, including in compliance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM, with particular attention to the increase of annual investments for donations and sponsorships towards social impact initiatives;
- promoting the development of human capital, including in accordance with the objectives set out in the 2022-2026 Sustainability Plan of the parent company ASTM, with particular attention to increasing the percentage of employees under the age of 30, training hours per capita and the evaluation of employee performance based on ESG (Environmental, Social and Governance) parameters;
- promoting Diversity and Inclusion, including in compliance with the objectives set out in the 2022-2026 Sustainability Plan by the parent company ASTM, with particular attention to increasing the percentage of women in the company, among new hires and in Management, applying human resources management and



development practices that promote an inclusive culture of access to company tasks and growth of the professional path, guaranteeing equal opportunities for all staff;

- ensuring equal and fair participation in training and development programs, with balanced representation of both genders, including leadership courses;
- guaranteeing equal gender representation among speakers at panel discussions, conferences, or scientific events, committing to identifying female expertise across all internal sectors and considering the work-life balance needs of those participating as speakers or audience members, selecting inclusive timing whenever possible;
- creating a working environment free from any direct or indirect discrimination, stereotyping or prejudice;
- supporting staff in becoming aware of the existence of unconscious biases and overcoming these;
- supporting an inclusive culture that is non-discriminatory in terms of gender, religion, nationality and origin, sexual orientation and identity, political affiliation, disability, health status, age, social category;
- ensuring favourable psychological and physical, moral and cultural conditions through a working environment that is respectful of individual dignity.

The Top Management, in order to create an active monitoring on the issue of Gender Equality, promoted the establishment of a Diversity and Inclusion Committee composed by the CEO, the Human Resources Manager and the Manager of the Integrated Management System and Sustainability.

Every worker can lodge complaints in relation to facts and events of the nature of abuse, harassment, offense or illegality which have occurred in the workplace or are linked to it and in conflict with the principles of gender equality.

Based on the roadmap outlined above, Itinera S.p.A. guarantees that anyone making reports will not be subject to any retaliation and/or discrimination and appropriate communication channels shall be provided that also ensure anonymity can be maintained when sending reports concerning the rules referred to above:

- Whistleblowing section available on the Itinera S.p.A. website at the following address: <https://www.itinera-spa.it/whistleblowing/>;
- in written form via regular or registered mail sent to the following address: ITINERA S.p.A., S.S.10 per Alessandria, 6A – 15057 Tortona (AL) Italy;
- special complaint boxes in the operational units;
- reports sent to the following recipients:
 - o Social Accountability International (SAI), info@sa-intl.org
 - o Social Accountability Accreditation Service, SAAS, saas@saasaccreditation.org
 - o Certification body for ITINERA's SA 8000 standard:
CISE - Centre for Innovation and Economic Development
Corso della Repubblica, 5 - 47121 Forlì Tel. 0543 - 713311
https://www.ciseonweb.it/admin/gesagen/impresaetica/risultati_ricerca.htm?ricerca=itinera
 - o Corporate RLSA8000;
 - o Members of the Social Performance Team.



The management of the Integrated Management System activities in the areas of Social Responsibility and Diversity and Inclusion supports Itinera S.p.A. in achieving the following SDGs:

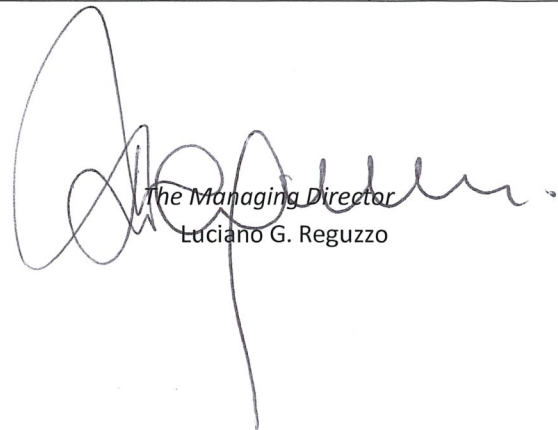


The Management has promoted, disseminated and implemented this Integrated Policy internally with all its employees, and undertakes to also make it known to external co-workers, suppliers and subcontractors in Italy and abroad, while encouraging them to apply the same principles and criteria within their value chain, including by promoting the Policy outside the organisation by publishing it on the company website.

Itinera S.p.A. evaluates this Policy at least once a year during the Integrated Management System Review on the basis of the results achieved. Whenever there is a change in the demands stakeholders make to the Company, or in the event of variations and changes at a strategic and/or operational level with regard to the Integrated Management System, the Policy is updated and submitted for the approval of Senior Management by the Management and Sustainability Systems Manager.

Revision	Description	Date
Rev.8	Alignment with ISO 9001:2015/Amd 1:2024 Quality Management Systems - Requirements Amendment 1: Climate Action Changes	19/03/2025

Tortona (AL), 19 March 2025

A handwritten signature in blue ink, appearing to read "Luciano G. Reguzzo".

The Managing Director
Luciano G. Reguzzo