



SERVIZI COMUNALI S.p.A.

**POLICY FOR QUALITY, ENVIRONMENT,
SAFETY AND SOCIAL ETHICS AND ANTI-
CORRUPTION**

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SEC. 05**

SERVIZI COMUNALI SPA operates in the sector for the provision of urban hygiene services. It operates the collection, transport and transfer of urban solid waste and similar, the trade and intermediation of waste, street sweeping and washing, the management of ecological platforms and local tax management service.

The policy of SERVIZI COMUNALI S.p.A. is both to satisfy the needs and expectations of its Customers, interested parties, business associates and workers and to achieve a primary reputation regarding the quality of the services provided through optimization and the pursuit of effectiveness in marketing, procurement, provision of services and control activities, operating with a view to safeguarding the environment, worker safety, compliance with the principles of ethics and anti-corruption, through the support of transparent administration.

The Management of SERVIZI COMUNALI S.p.A. believes that the establishment of the Integrated Management System (Quality, Environment, Corporate Safety, Ethics and Anti-corruption) compliant with the UNI EN ISO 9001:2015, UNI ISO 14001:2015 and UNI ISO 45001:2018, EMAS, SA8000:2014 and UNI 37001:2016 is the road that leads to the implementation of the Policy and the achievement of the objectives specified below:

- compliance with applicable laws, contractual provisions and compliance for the prevention of corruption applicable to the organization and business associates;
- make places safe and healthy, predicting work-related injuries and illnesses, as well as proactively improving their performance related to the workplace health and safety system;
- ensure constant control of company regulatory compliance, both with respect to mandatory legislative principles and those to which the company voluntarily adheres;
- obtaining the pre-established quality at minimum cost;
- preference for the prevention of non-conformities and non-quality problems, environmental management and occupational safety;
- strengthening top management to demonstrate leadership and commitment in relation to the management system and to ensure consultation and participation of workers in the development, planning, implementation and continuous improvement of the integrated management system;
- no compromises regarding the safety of workers and an environmental management compliant with the legal requirements of the services to be provided;
- making all personnel responsible for the quality of their work and the need to pursue continuous improvement of the Integrated Quality, Environment and Safety Management System by fulfilling the explicit and implicit requirements of the Customer;
- making the Department Managers responsible so that they ensure the application of the Quality, Environment and Safety Policy and the maintenance of the Integrated Quality, Environment and Safety Management System in full efficiency;
- personnel training planning for all functions and at all levels, making them aware of internal and external environmental issues and informing them of the risks associated with their duties and activities;
- quality improvement planning;
- optimization of the supplier pool, through the assessment of their performance and the selection of products, materials and equipment with a lower environmental impact and a reduction in risk for workers;
- stimulate suppliers, customers and users to operate, as far as possible, with a view to continuous improvement and sustainable development;



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- optimizing processes in order to improve company competitiveness and facilitate identification of dangers, keep risks under control and exploit the opportunities of the integrated management system;

- sustainable use of water, energy and natural resources;

- optimization of waste collection activities, while maintaining high delivery standards, in order to reduce emissions into the atmosphere and the impact on traffic

- containment of emissions into the atmosphere, water, noise and soil and consequent mitigation of the environmental impact;

- careful management of substances potentially dangerous for the environment through an assessment of risks and effects, and adoption of specific procedures;

- correct compilation and archiving of the quality, environment and safety records which constitute objective proof of the quality of the service;

- definition of environmental objectives/targets for the corporate functions which allow for the verification of the adequacy and continuous improvement of the Integrated Quality, Environment and Safety Management System;

- implementation of the local tax management service for public entities and municipalities
Responsibility for the application and measurement of the above is assigned to the Function Managers. They must coordinate the existing resources within their services, including - where applicable - also the external personnel who work in the company (contractors), so that the activities under their responsibility are performed in accordance with the provisions of the Integrated Quality Management System, Corporate environment and safety.

They must also report to the RSQAS on what they have achieved of the specified objectives:

- qualitative improvement of supplies taking into account their possible environmental impact and the reduction of risks for workers;
- development, guidance and promotion by the Management of a culture in the organization that supports the achievement of the expected results of the integrated management system;
- improvement of the environmental management service;
- improvement of the delivery service by reducing the non-conformities found, improving user satisfaction and operating with the primary aim of protecting the environment and worker safety;
- Application of the Plan-Do-Check-Act (PDCA) concept at all levels;
- increase the number of customers and users for each type of service.

To achieve these goals, SERVIZI COMUNALI S.p.A. considers the implementation of the skills of both internal staff, external collaborators and interested parties to be a primary strategy.

In pursuing these objectives, the company promotes the adoption of a process approach and the application of risk assessment in the development, implementation and continuous improvement of the effectiveness of its Integrated Management System.

The Management of SERVIZI COMUNALI S.p.A. undertakes to ensure that the policy and the integrated objectives set out above are understood, implemented and supported at all company levels.

The Management of SERVIZI COMUNALI S.p.A. undertakes to carry out the implementation of the Integrated Management system as an integral part of company management, aimed at prevention, to provide necessary and adequate human and instrumental resources, involving and consulting workers for risk assessment (handling and handling of waste, use of vehicles and equipment, road safety, biological risk, etc.).

The Management of SERVIZI COMUNALI S.p.A. finally undertakes to monitor the progress of the aforementioned objectives through the planning and execution of internal audits of the




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Integrated Quality, Environment and Safety System and the definition of quality, environmental and safety indicators, the values of which will be established from time to time from time to time, on the occasion of Management Reviews.

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COMPLIANCE WITH THE SA8000 ETHICAL STANDARD

SERVIZI COMUNALI S.p.A has decided to introduce the voluntary standard SA8000, based on the Universal Declaration of Human Rights, on ILO documents and other international standards concerning human and labor rights, as well as on national laws, to enhance and protect all personnel falling within the of control and influence in an organization.

Compliance with the eight elements required by the international standard, namely:

- Child labour;
- Forced labor;
- Health & Safety;
- Freedom of association, right to collective bargaining;
- Discrimination;
- Disciplinary practices;
- working hours;
- Remuneration criteria

They are essential for the correct implementation, monitoring and application of the SA8000 system.

In this regard, the Management works continuously to:

- Establish a climate of mutual harmony from an organizational point of view;
- Maintain optimal relations between personnel and the company, foster a participatory model and dialogue with personnel, carry out climate analyses;
- Apply equal opportunity criteria to all personnel levels (recruitment, training, development, promotion, etc.);
- Avoid forms of discrimination and marginalization and promote equal opportunities for all personnel.
- activate a gradual involvement of SUPPLIERS in the ethical path undertaken, in order to consider them as partners also on issues of social responsibility;
- consider its CUSTOMERS as a fundamental element of its success, guaranteeing a service that reflects the ethical behavior of the company.

According to what is defined by the Sa 8000 standards and above all for the purposes of greater security in compliance with and continuous monitoring of Sa 8000 performances, the company has also set up a team (Social Performaces Team) which periodically reviews and monitors Sa 8000 performances and is concerned to ensure compliance with the social responsibility requirements of the interested parties by proposing to the management actions to be taken to improve performance.

Every year during the Review, the Management undertakes to define new measurable and quantifiable objectives for Social Responsibility, with a view to the continuous improvement of its performance. In this perspective, it is believed that the importance of the active involvement of personnel, suppliers and other stakeholders in the formulation of proposals and ideas for improvement and in the implementation of the System is emphasized through communication, training and awareness-raising activities on Social Responsibility issues. SERVIZI COMUNALI S.p.A the documentation, implementation and storage of information and results of its Social Accountability Management System, ensuring its accessibility and availability to all interested parties who wish to view it.



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COMPLIANCE WITH ANTI-CORRUPTION REQUIREMENTS

Servizi Comunali Spa is firmly convinced that its commitment to the prevention of Corruption can influence its contractual relationships, thus guaranteeing a progressive dissemination of ethical principles and values to an ever wider sphere of stakeholders.

Servizi Comunali Spa formally undertakes to:

- Comply with all the requirements of the UNI ISO 37001 standard;
- Prohibit all forms of corruption by adopting a zero tolerance approach towards it;
- Comply with National Laws, other Laws and applicable anti-corruption requirements;
- Implement and keep the anti-corruption system updated in order to ensure continuous improvement of its performance;
- Supervise the application of the internal Code of Ethics regarding the regulation of business conduct;
- Make this Policy public and accessible at all levels of the company by posting it on the bulletin board, posting it on the website and providing suitable training;
- Encourage the reporting of concerns in good faith, or based on a reasonable and confidential belief, without fear of retaliation;
- Adapt this Policy to regulatory developments in the sector and to the needs deriving from the requirements defined in the Anti-Corruption management system with a view to continuous improvement.

To facilitate the achievement of the objectives of this policy, Servizi Comunali Spa undertakes not to generate organizational, ethical and relationship uncertainty, through:

- A clear definition of its processes;
- A unique identification of roles and functions;
- A transparent delegation system;
- A linear system of rules, values, procedures and practices suggested by experience, to facilitate the decision-making process within the organisation;
- A capillary procurement system for goods and services that excludes fraudulent suppliers and supplies through periodic monitoring actions for their qualification;
- An adequate system of internal controls aimed at the behavior of all its employees;
- An adequate external control system aimed at the processes of all the Company's suppliers and collaborators.

To achieve its anti-corruption objectives, Servizi Comunali Spa expresses its willingness to involve and share the commitments for a widespread Anti-Corruption Policy to all Stakeholders (employees, collaborators, business partners, suppliers, etc.)

The Policy is therefore made available as documented information, communicated in the appropriate languages within the organization and to business associates.

Sarnico (BG), 31 maggio 2023

GENERAL MANAGER

Dott. Enrico de Taronatti



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COMPANY OBJECTIVES FOR SAFETY

The Company sets itself the following safety objectives

A) CORRECT AND PRUDENT DRIVING, TAKING INTO ACCOUNT ESPECIALLY THE CRITICAL SITUATIONS DURING THE COLLECTION: REVERSING MANEUVERS, MOVEMENTS OF THE VEHICLE ON DIFFERENT SIDES OF THE ROAD, CROSSING CROSSINGS.

B) PROHIBITION OF CONSUMPTION OF ALCOHOL BEFORE THE BEGINNING OF THE WORK SHIFT AND DURING THE WORK SHIFT.

C) CORRECT AND CONTINUOUS USE OF THE PERSONAL PROTECTIVE EQUIPMENT PROVIDED TO ELIMINATE OR LIMIT THE RISKS OF INJURY TO THE MAXIMUM.

D) ATTENTION TO BIOLOGICAL RISK: STITCHES, CUTS, WASHING OF CLOTHES, WASHING OF HANDS/BODY

E) AWARENESS BY ALL PARTIES INVOLVED OF SAFETY AT THE WORKPLACE AS A RESOURCE.

F) INVOLVEMENT OF ALL PARTIES, EACH PERSON'S PERFORMANCE, IN THE IMPLEMENTATION OF THE SYSTEM: REPORTING OF RISKS THAT MAY NOT BE SUFFICIENTLY ASSESSED, INDICATIONS FOR IMPROVEMENTS TO PPE, INDICATIONS FOR NEW SAFETY PROCEDURES OR ADDITIONS TO EXISTING PROCEDURES.