

SERVIZI COMUNALI Spa operates in the field of urban hygiene services provision. It handles the collection, transportation, and disposal of urban solid waste and similar materials, as well as trading and brokerage of waste, street sweeping and washing, management of ecological platforms, and local tax management services. The policy of SERVIZI COMUNALI Spa aims to meet the needs and expectations of its customers, stakeholders, business partners, and workers, while also striving to achieve a leading reputation for the quality of services provided through optimization and effectiveness in marketing, procurement, service delivery, and control activities, operating with a focus on environmental preservation, worker safety, adherence to ethical principles, and anti-corruption efforts, supported by transparent administration.

The management of SERVIZI COMUNALI Spa believes that the establishment of an Integrated Management System (Quality, Environment, Occupational Health and Safety, Social Ethics, and Anti-Corruption) in compliance with UNI EN ISO 9001:2015, UNI ISO 14001:2015, UNI ISO 45001:2023, EMAS, SA8000:2014, and UNI 37001:2026 standards is the path to implementing the policy and achieving the following objectives:

- Compliance with applicable laws, contractual requirements, and corruption prevention compliance applicable to the organization and business partners;
- Ensuring safe and healthy workplaces, preventing work-related injuries and illnesses, and proactively improving performance related to workplace health and safety systems;
- Ensuring constant monitoring of corporate regulatory compliance, both regarding mandatory legislative principles and those voluntarily adhered to by the company;
- Achieving predetermined quality at the minimum cost;
- Preference for preventing non-conformities and issues related to quality, environmental management, and occupational safety;
- Strengthening top management in demonstrating leadership and commitment to the management system and ensuring consultation and participation of workers in the development, planning, implementation, and continuous improvement of the integrated management system;
- No compromise on worker safety and compliance with environmental management legal requirements for services to be provided;
- Empowering all staff regarding the quality of their work and the need for continuous improvement of the Integrated Quality, Environment, and Safety Management System by fulfilling explicit and implicit customer requirements;
- Ensuring that Function Managers ensure compliance with the Quality, Environment, and Safety Policy and the maintenance of full efficiency of the Integrated Quality, Environment, and Safety Management System;
- Planning staff training at all levels, raising awareness of internal and external environmental issues, and informing them of the risks associated with their roles and activities;
- Planning quality improvement;
- Optimizing the supplier base by evaluating their performance and selecting products, materials, and equipment with minimal environmental impact and reduced risk to workers;
- Encouraging suppliers, customers, and users to operate, where possible, with a focus on continuous improvement and sustainable development;
- Optimizing processes to enhance corporate competitiveness and facilitate hazard identification, risk control, and exploitation of the opportunities of the integrated management system;
- Sustainable use of water, energy, and natural resources.

- Optimization of waste collection activities, while maintaining high service standards, to reduce emissions into the atmosphere and impact on traffic.
- Containment of emissions into the atmosphere, water, noise, and soil, and subsequent mitigation of environmental impact.
- Careful management of substances potentially harmful to the environment through risk assessment and adoption of specific procedures.
- Proper compilation and archiving of quality, environmental, and safety records that constitute objective evidence of service quality.
- Definition of environmental objectives/targets for business functions to verify the adequacy and continuous improvement of the Integrated Quality, Environment, and Safety Management System.
- Implementation of Local Tax Management Service for public bodies and municipalities.

The responsibility for implementing and measuring the above lies with the Function Managers. They must coordinate existing resources within their services, including – where applicable – external personnel working in the company (third parties), to ensure that activities within their competence are carried out in accordance with the Integrated Quality, Environment, and Safety Management System.

They must also report to the Integrated Quality, Environment, and Safety Management System representative regarding the achievement of specified objectives:

- Improved quality of supplies considering their potential environmental impact and reducing risks for workers.
- Development, guidance, and promotion by the Management of a culture within the organization that supports the achievement of expected results of the integrated management system.
- Improvement of environmental management service.
- Improvement of service delivery by reducing identified non-conformities, enhancing user satisfaction, and operating with the primary aim of safeguarding the environment and worker safety.
- Application of the Plan-Do-Check-Act (PDCA) concept at all levels.
- Expansion of the number of clients and users for each type of service.

To achieve these objectives, SERVIZI COMUNALI S.p.A. considers a primary strategy to be the enhancement of competencies among internal staff, external collaborators, and stakeholders.

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 its Integrated Management System.

The Management of SERVIZI COMUNALI S.p.A. commits to ensuring that the integrated policy and objectives outlined above are understood, implemented, and supported at all levels of the company.

Furthermore, the Management pledges to implement the Integrated Management System as an integral part of business management, aimed at prevention, providing necessary and adequate human and instrumental resources, and involving and consulting workers for risk assessment (handling and manipulation of waste, use of vehicles and equipment, road safety, biological risk, etc.).

Finally, the Management commits to monitoring the progress of these objectives through the planning and execution of internal inspection checks of the 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 during Management Reviews.

The Management of Servizi Comunali Spa has decided to introduce the voluntary SA8000 standard, based on the Universal Declaration of Human Rights, ILO documents, and other

international norms concerning human and labor rights, as well as national laws, to enhance and protect all personnel falling within the sphere of control and influence of an organization.

The company respects the eight elements provided by the international standard, namely:

- No use of child labor and young workers: prohibition of employing individuals below the legally recognized minimum age to start working.
- Respect for working hours, proper management of labor remuneration, and no use of forced labor: Servizi Comunalì Spa commits to respecting normal working weeks, not exceeding the overtime hours stipulated by the applicable National Collective Bargaining Agreement (CCNL). Any request for overtime work, always below legal limits, is voluntary and not forced.
- Compliance with mandatory requirements regarding Health and Safety at work.
- Freedom of association, right to collective bargaining, and respect for the personal freedoms of each individual worker: Servizi Comunalì Spa respects every right to peaceful assembly and freedom of association at all levels, particularly in trade unions, political parties, and civic matters, thereby implying the right of all to form and participate in unions to protect their interests. This includes collective bargaining, as a negotiation process between employers and a group of employees, aimed at reaching an agreement governing working conditions.
- Non-discrimination: Servizi Comunalì Spa opposes all forms of discrimination and commits to equal treatment for all workers regardless of their particular characteristics, including sex, race, color, ethnicity or social origin, genetic features, language, religion or belief, political opinion or any other status, ethnic minority status, property, birth, disability, age, or sexual orientation.
- Disciplinary practices.
- Diversity, equality, and inclusion: Servizi Comunalì Spa develops and promotes inclusive cultures where diversity is valued, celebrated, and where everyone can fully contribute and reach their maximum potential. Servizi Comunalì Spa encourages diversity at all levels of its workforce and leadership.
- Compensation criteria, respect for wages, and benefits: Servizi Comunalì Spa respects the basic or minimum wage and any additional rights owed directly or indirectly by the employer to the worker and arising from the worker's employment. Servizi Comunalì Spa also ensures that suppliers provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be sufficient to meet basic needs and enable a decent standard of living for workers and their families, including compliance with minimum wage laws, payment for overtime work, family care leave, and state-funded benefits.

According to the SA8000 standards and especially for the purpose of ensuring greater respect and continuous monitoring of SA8000 performance, the company has established a team (Social Performance Team) that periodically reviews and monitors SA8000 performance and ensures compliance with social responsibility requirements by proposing actions to the management for performance improvement.

Every year during the Review, the Management commits to defining new measurable and quantifiable objectives for Social Responsibility, with the aim of continuous improvement in performance. In this perspective, importance is given to active involvement of employees, suppliers, and other stakeholders in formulating proposals and ideas for improvement and in implementing the system through communication, training, and awareness-raising activities on social responsibility issues.



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

**ALLEGATO E  
SEZ. 05**

Servizi Comunali Spa ensures the documentation, implementation, and preservation of information and results of its Social Responsibility Management System, guaranteeing accessibility and availability to all interested parties who wish to view them.

Below are the contact details for sending SA8000 reports:



Servizi Comunali SpA

SERVIZI COMUNALI Spa  
Via Del Molino  
Chiuduno (Bg)  
Modulo di segnalazione tramite cassetta  
anonima



TUV NORD  
Via Filippo Turati, 70  
20023 Cerro Maggiore (MI)  
Tel. 0331 541488  
Tel. 0331 541488  
Fax: 0331478854  
Mail: info@tuev-nord.it

SAAS – Social Accountability  
Accreditation Service  
15 West 44th Street 6th fl.  
NY 10036 New York  
Tel. (212) 684-1414  
Fax: (212) 684-1515  
Mail: saas@saasaccreditation.org

"RESPECT OF ANTI-CORRUPTION REQUIREMENTS"

Servizi Comunali Spa firmly believes that its commitment to preventing corruption can influence its contractual relationships, thus ensuring a progressive dissemination of ethical principles and values to a wider range of stakeholders.

Servizi Comunali Spa formally commits to:

- Complying with all requirements of the UNI ISO 37001 Standard;
- Prohibiting any form of corruption by adopting a zero-tolerance approach towards it;
- Observing national laws, other laws, and prevailing anti-corruption requirements;
- Implementing and keeping the anti-corruption system up-to-date to ensure continuous improvement of its performance;
- Monitoring the application of the internal Code of Ethics regarding the regulation of business conduct;
- Making this Policy publicly available and accessible to all levels of the company through posting on bulletin boards, publication on the website, and appropriate training;
- Encouraging the reporting of suspicions in good faith, or based on reasonable and confidential conviction, without fear of retaliation;
- Adapting this Policy to sectoral regulatory developments and the needs arising 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 commits to avoiding organizational, ethical, and relational uncertainty by:

- Clearly defining its processes;
- Unambiguously identifying roles and functions;
- Establishing a transparent system of delegation;
- Implementing a straightforward system of rules, values, procedures, and practices suggested by experience to facilitate decision-making within the organization;
- Implementing a thorough procurement system for goods and services that excludes fraudulent suppliers and supplies through periodic monitoring actions for their qualification;
- Implementing an adequate internal control system aimed at the behavior of all its employees;
- Implementing an adequate external control system aimed at the processes of all suppliers and collaborators of the Company.

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

Therefore, the Policy is made available as documented information, communicated in the appropriate languages within the organization and to business partners.

Sarnico (BG), April 10, 2024

GENERAL MANAGER

Dr. Enrico De Tavonatti

#### SAFETY COMPANY OBJECTIVES

The company sets the following objectives regarding safety:

- A) Safe and prudent driving, especially considering critical situations during waste collection: maneuvers in reverse, vehicle movements on different sides of the road, crossing intersections.
- B) Prohibition of alcohol consumption both before the start of the work shift and during the work shift.
- C) Correct and continuous use of provided personal protective equipment to eliminate or minimize injury risks.
- D) Attention to biological risks: punctures, cuts, clothing washing, hand/body washing.
- E) Awareness by all involved parties of workplace safety as a resource.
- F) Involvement of all parties, each according to their competence, in the implementation of the system: reporting of risks that may not have been sufficiently evaluated, suggestions for improvements to personal protective equipment, suggestions for new safety procedures or integration with existing ones.

The Management