

POLICY FOR QUALITY, THE ENVIRONMENT/EMAS, HEALTH and SAFETY PREVENTION OF CORRUPTION

MIORELLI Service S.p.A. a socio unico, a sole shareholder company, aware of the fact that it is not an isolated entity but rather an entity set within an increasingly demanding economic and social scenario, in order to continue improving and consolidating its market position, intends to manifest the importance of applying and of promoting a strong and constant action towards:

- The management and improvement of the Integrated Management System for Quality, Safety and the Environment/EMAS, Anti-bribery in compliance with the standards UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI ISO 37001:2016 and the regulations EC Reg. 1221/2009, EU Reg. 2017/1505 and EU Reg. 2018/2026 and the 'Modello Organizzativo' (Organizational Model) of Italian Leg. Decree No. 231/01;
- Compliance with environmental protection measures and the prevention of pollution in the activities and services performed;
- Commitment to ensuring safe and healthy working conditions towards the prevention of accidents, including workplace injuries and professional illnesses;
- Pursuance and consolidation of Customer Satisfaction;
- Commitment to ensuring full and systematic compliance of all of the services supplied to our clientele with the pertaining mandatory regulatory, contractual and technical requirements applicable regarding bribery.

Through this Policy, the Management, represented by the Sole Director, intends to notify both inside and outside the Organization its intent to work systematically with efficient and transparent methods in order to ensure a corporate Integrated Management System that is socially and economically sustainable, and to improve on it continuously.

In this regard, the Management has planned and outlined the following commitments and intentions:

1. consolidation and continuous improvement of the Integrated Management System for Quality, Safety and the Environment/EMAS, Anti-bribery in line with the indications of the Parties concerned (employees, consultants, suppliers, service users, society, etc.), with the amendments to the regulations and laws and with the transformations within the social, cultural and economic contexts in which the Organization operates;
2. it is forbidden to put in place corruptive actions
3. constant commitment to meeting all of the requirements envisaged by the anti-bribery system;
4. constant commitment to encouraging whistleblowing in good faith;
5. constant commitment to continuously improving the corporate anti-bribery system;
6. the commitments taken have been identified and periodically reassessed within the Management's review in order to constantly improve the corporate anti-bribery system in use;
7. the authority and independence of the anti-bribery compliance function have been identified;
8. the consequences of any N-C with the current policy have been identified
9. guarantee for the Customer regarding the quality standards expected for the services provided;
10. pursuance of Customer Satisfaction;
11. monitoring and measurement of Customer Satisfaction and of the effectiveness of corporate system processes;
12. preference for suppliers capable of providing products and services that are most compatible with the environmental and safety objectives;
13. compliance with applicable national and international requisites, with the commitments undertaken with the Parties concerned and with the norms taken as reference for the system;
14. analysis and evaluation of the indications coming from the Parties concerned in order to create an open and constructive dialogue with them towards achieving mutually satisfying intents and objectives;
15. maintenance of an effective internal and external communication system;

16. promotion within the staff of the awareness of the importance of the activities carried out in terms of the effectiveness of the Integrated Management System for Quality, Safety and the Environment/EMAS and Anti-bribery;
17. assurance of continuing consolidation of knowledge regarding the regulations of reference to as to boost internal compliance and improvement;
18. research and promotion of the Actions most suitable for preventing or correcting the occurrence of Non-Conformities;
19. improvement of services provided, elimination of hazards, reduction in environmental impact and in significant risks;
20. continuous improvement of the integrated management system on all of the premises where the Organization is present;
21. Organization's commitment to continuing to perform periodic reviews of the Management System so as to evaluate its adequacy and effectiveness over time and any opportunities for improvement;
22. increase its competitiveness on the market and its upkeeping of very high levels of reliability and of quality of the services provided, in full compliance with all legal, environmental, safety and quality requisites; increase in awareness among staff members of their role and liability in safety matters;
23. promotion of the workers' participation and consultation, including via their representatives;
24. fight against all forms of bribery; constant monitoring of compliance with the applicable norms, the corporate processes, the principles and requisites defined in UNI EN 37001:2016; definition of the anti-bribery objectives so as to guarantee continuous improvement; encouragement of whistleblowing in good faith or based on reasonable trust and without the fear of retaliation; sensitisation, promotion and training of the whole staff towards making the so-called 'Modello 231' and the Anti-bribery System integral parts of corporate management, known and applied to every internal member from top to bottom, with the involvement and sharing of its commitment with every Stakeholder;
25. management and control of the prevention of administrative accountability of internal bodies for crimes against the Public Administration, via the application of the 'Modello Organizzativo' of Italian Legislative Decree No. 231/01;
26. the current policy reflects the scenario of reference for the objectives identified by the company

The Management confirms the assignment to the Management Representative for Quality, the Environment/Emas and Safety and Anti-briber of the task of managing the Integrated System, with a view to continuously improving it, in order to pursue the objectives contained in this Policy.

To this end, with full empowerment and organizational freedom, it will be expected to perform the following tasks:

- ⇒ Supervise the drafting and implementation of the Management Systems;
- ⇒ Promote the actions aimed at preventing the occurrence of service Non-Conformities;
- ⇒ Identify and log problems regarding quality, management of the Environment/EMAS and of Safety, failure to comply with the Anti-bribery System;
- ⇒ Launch, propose and provide solutions via the established channels;
- ⇒ Verify the implementation of the solutions;
- ⇒ Report to the Company's Top Management about the performance of the Systems.

Finally, in order to demonstrate the application and effective implementation of the Safety Organization and Management model, the Organization has obtained the 'Asseverazione' (declaration of correct use and implementation of the Safety Organisation and Management model) from the Bilateral Body.

Mori, 10 February 2021


The Sole Director
Dr. Alessio Miorelli