

This Sustainability Policy applies to the Integrated Management System, which governs the Quality and Safety of Products, Organisational Processes, Human and Professional Relations, respect for the Environment, Energy Savings, Occupational Health and Safety, Social Responsibility, and Respect for Labour and Workers.

SUSTAINABILITY POLICY

The standards and operational mechanisms implemented are attributable to:

- **Quality: ISO 9001**
- **Environment: ISO 14001**
- **Social Responsibility: SA 8000**

Having adopted and instituted continuous improvement as one of the fundamental aims of the Integrated Management System, MEP:

- promotes, exhorts, instructs and empowers all Employees, Suppliers, External Collaborators and Shareholders (Stakeholders & Stockholders) to contribute to the achievement of the defined objectives, against the principles set out in this policy;
- undertakes with Social Responsibility to implement improvement plans, which lay down measurable, quantified, justifiable and evaluated targets in the Management Review;
- disseminates this Policy to all Employees, Stakeholders & Stockholders, makes it available to Interested Parties and those who request it, evaluates it annually during the Management Review.
- protects, safeguards the fundamental rights of individual, collective and organisational life of all Human, Social, Environmental Resources activated by the Corporate & Compliance Governance adopted.

General principles:

- Ensure the Quality and Safety of products and services.
- Adopt the “Satisfaction of the Customer and all Interested Parties” as the primary value on which to base the management and operations of the Company.
- Adopt a Risk Based Thinking approach in the management of all internal and external processes.
- Meet all Customer requirements, including specific codes of conduct (social, anti-corruption, ethical, community, etc.).
- Consider service as a decisive factor for its success, positioning itself as an interlocutor of the Customer to solve their problems and not, simply, as a supplier of goods/services.
- Commit to meeting requirements and to the effectiveness of the integrated management system.
- Aim at the professional and cultural growth of employees (MEP Business School).
- Consider Suppliers an integral part of the production process.
- Generate positive impacts on the environment, with a focus on renewable energies and energy savings.
- Pursue continuous improvement in energy performance.
- Comply with mandatory regulations on products, the environment, energy management, health/safety, corporate social responsibility.
- Pursue the improvement of the performance of the whole System, preventing (product, environmental, related to working conditions, regulatory, ethical, behavioural) Non-Compliances, analysing their causes in order to implement effective remedies, prevent their

- recurrence and reduce, with regard to Social Responsibility, the number of accidents and occupational diseases.
- Conduct business in a fair and proper manner, applying the Code of Ethics, in order to combat corruption, abuse of office and extortion, as well as the practice of giving and receiving gifts/gratuities of unjustified amounts;
 - Protect its Know-How, the tangible and intangible assets of the Company, of the Human Resources, their well-being and their individual, professional and social culture and integrity;
 - Protect the intellectual, social and ethical property of Customers;
 - Implement sound business practices;
 - Ensure respect for privacy and personal information;
 - Ensure the correctness of administration and accounting records;
 - Bindingly integrate the management of every company activity with the management of occupational health and safety and its indicators by actively involving all Workers;
 - Respect and protect the environment, sustainability and biodiversity; striving to reduce the production of waste from the production cycle by favouring, where possible, the recycling of materials, containment of emissions and more generally reduce pollution;
 - Take prompt action in the event of any environmental and safety emergencies, with the help of a fully trained emergency team to deal with and prevent environmental impacts.
- Implement SA8000 principles:
1. NO to child and underage labour.
 2. Work is freely chosen.
 3. The workplaces are safe and hygienic, inclusive and assertive, non-discriminatory, non-servile, non-humiliating, non-harassing for any gender, human, social, professional, cultural, educational, political, religious, ethnic, physical and spiritual characteristics.
 4. Freedom of association and the right to collective bargaining are respected.
 5. NO to all forms of discrimination and menial commission of Human Resources.
 6. NO to inhuman disciplinary practices.
 7. Working hours are not excessive.
 8. The pay must be decent.
 9. Internal continuous improvement of Human Resources, suppliers and collaborators.
 10. Culture of individual, professional, social, cultural relational excellence so that the best conditions of well-being are a physical and spiritual state.

Quality of the product and delivered services

- Ensuring the readiness of Customers to become an elective and adoptive community of shared industrial, civic, technological, ethical and economic principles.
- Increasing Customer and Stakeholder satisfaction.
- Reducing the number and cost of complaints and non-compliances, including environmental ones.
- Setting goals and targets for continuous improvement and sustainable development.
- Implementing internal and external communication consistent with corporate principles and values.
- Ensuring a careful analysis of the context, that the expectations of Stakeholders are met, and that the risks related to processes are assessed, planning effective risk prevention and mitigation actions.
- Promoting the sustainability of the production chain.
- Disseminating and supporting this Integrated Policy at all levels by making it available to the public, external bodies and any stakeholders.
- Involving suppliers in Quality, Environment, Social Responsibility, Safety, Ethics to:
 - ✓ evaluate their performance and take it into account at contract renewals;

- ✓ improve the performance of the supply chain, with corrective actions following non-compliances.

Environmental Aspects and Impacts and Energy Performance

Waste:

- ✓ manage waste by taking all necessary precautions;
- ✓ entrust its waste to qualified disposal operators, prioritising recovery over disposal.

Raw materials:

- ✓ communicate the policy to all suppliers, sharing with them the principles of compliance contained therein;
- ✓ select suppliers on the basis of the degree to which they comply with the principles of this policy.

Water:

- ✓ use the water available without wasting it, avoiding unnecessarily polluting it and properly managing discharges from production activities and subsequent purification.

Pollution:

- ✓ comply with legal requirements while minimising environmental impact;
- ✓ minimise impacts such as light, noise, odour, vibrations and other sources of disturbance and environmental pollution.

Emissions:

- ✓ comply with legal limits while minimising the environmental impact;
- ✓ monitor and minimise emissions of pollutants (greenhouse gases) into the atmosphere;
- ✓ keep all installations at peak efficiency by carrying out scheduled maintenance.

Energy:

- ✓ adopt an energy management system appropriate to the nature and scale of energy use and consumption;
- ✓ ensure the availability of information and the necessary resources to achieve objectives and targets;
- ✓ comply with applicable legislative requirements concerning energy use (energy consumption and energy efficiency);
- ✓ provide the framework for setting and reviewing energy objectives and targets;
- ✓ support the design and purchase of energy-efficient products and services aimed at improving energy performance;
- ✓ minimise the use of energy generated from fossil fuels;
- ✓ improve the efficiency of lighting, production equipment and other energy uses;
- ✓ raise staff awareness with regard to the conscientious use of energy resources;
- ✓ prioritise design criteria and construction technologies aimed at improving energy performance when renovating buildings.

Renewable energy:

- ✓ prioritise suppliers, including energy suppliers, to ensure that at least part of the energy used in the production and processing of the raw materials used and the energy produced comes from renewable sources and/or that they have an energy management system.

Biodiversity:

- ✓ engage suppliers and stakeholders to analyse and minimise the impact of supply chain activities on biodiversity.

Occupational health and safety

Information, education and training:

- ✓ Guarantee each worker an adequate and periodic process of information, instruction and training for each risk to which he or she is exposed, particularly for new activities or change in duties.
- ✓ Prevent injury or occupational disease.
- ✓ Collaborate with the Supervisory Body appointed pursuant to Legislative Decree no. 231/2001.

Emergencies and Fire Protection:

- ✓ Ensure the safety of all Workers, especially the weaker categories, in the event of an emergency;
- ✓ Adequately inform, educate and train all Workers depending on their role and responsibilities regarding emergencies that may occur at the plant.

Workers' Health and Well-being:

- ✓ Promote healthy lifestyles;
- ✓ Ensure health surveillance.

Machinery, equipment and hazardous substances:

- ✓ Assess risks in advance, provide Workers with machinery, equipment and hazardous substances that comply with specific health and safety regulations;
- ✓ Adopt appropriate prevention and protection measures, also depending on the residual risks, on the basis of the cost/benefit ratio and technological progress.

Work environment:

- ✓ Ensure a healthy and safe work environment.

Labour and Respect for Workers

Child and underage labour:

- ✓ MEP does not select and does not hire Workers under the age of 18;
- ✓ In the presence of child or underage labour, MEP is committed to remedying it in the best interests of the child and his/her family.

Work is freely chosen:

- ✓ Avoid all forms of forced labour (including demands for money and the use of prison labour);
- ✓ Do not subcontract work in prisons or facilities with prison labour unless required by law;
- ✓ Commitment to work only with qualified employment agencies that comply with all applicable laws and company codes of conduct.

Freedom of association and collective bargaining:

- ✓ Recruitment, promotions, secondments and disciplinary measures must not be influenced by an employee's membership of a trade union;
- ✓ MEP supports Workers' rights to freedom of association and collective bargaining;
- ✓ MEP supports effective collaboration with the Workers with a view to effective mediation between the parties for joint progress, shared development and mutual well-being.

Discrimination:

- ✓ MEP is committed to equality in the workplace and to avoiding all forms of discrimination;

- ✓ There is an explicit prohibition of all practices of discrimination in determining recruitment, wage and benefits, promotions, disciplinary measures, termination of employment, ordinary management of personnel on the basis of any of the following: age, social class, ethnicity, disability, gender, sexual orientation, health status, marital status, nationality, migrant worker status, political opinion, religion, trade union membership
- ✓ MEPs explicitly prohibits requiring female applicants/employees to provide information on their pregnancy status and to conduct pregnancy tests to determine employment or continuation of employment.

Disciplinary practices:

- ✓ MEP treats all staff with dignity and respect and undertakes not to use or tolerate the use of corporal punishment, physical or mental coercion, menial errands or verbal abuse of staff.
- ✓ MEP applies an internal code of conduct for Managers, Supervisors and Workers that prohibits verbal and physical abuse and other inhumane disciplinary practices, as well as punitive sanctions and deductions from wages that are not in accordance with the law and the applicable National Collective Bargaining Agreement;
- ✓ MEP considers the disciplinary system to be a performance improvement process and not a punitive one.
- ✓ MEP is committed to ensuring that Workers can freely report grievances without fear of sanctions, unfair disciplinary measures, or reprisals of any kind.

Working hours; MEP undertakes to:

- ✓ apply to all workers a National Collective Bargaining Agreement (CCNL), signed by recognised social partners;
- ✓ not to exceed the working hours stipulated in the CCNL;
- ✓ guarantee all breaks, as well as rest days and holidays as per the CCNL;
- ✓ comply with the limit on overtime, as required by Italian law.
- ✓ ensure that all overtime hours are voluntary and that Workers do not incur penalties for refusing overtime (including threats, intimidation and loss of benefits, etc.)
- ✓ ensure that all Workers have a regular employment contract;
- ✓ not use consecutive fixed-term contracts as a substitute for permanent full-time or part-time contracts;
- ✓ ensure that contracted Workers and trainees are graded and paid as required by law.

Wages; MEP undertakes to:

- ✓ provide Workers with wages that meet the minimum wage as per the CCNL;
- ✓ pay overtime and rest days and holidays as per the CCNL;
- ✓ pay all social security contributions due;
- ✓ guarantee holidays, sick leave, maternity leave and any other leave required by law.

Ethics

- ✓ All reports of unethical conduct will be carefully analysed and addressed.
- ✓ The company will cooperate in the event of any corruption investigations conducted by the Supervisory Authorities.
- ✓ Employees undertake to exchange gifts that are of modest nominal value, for the sole purpose of establishing good business relations with the Stakeholders.
- ✓ The company ensures ethical business practices through transparent financial reporting.