

INTEGRATED POLICY

ICM S.p.A. has been active since 1921 as a general construction company in both the private and public sector carrying out civil, road, hydraulic and infrastructural works in general. The technical-administrative structure, the equipment, the organizational and the production experience enable the company to deal with tasks of any nature and scale, both in Italy and abroad. ICM intends to act as center of coordination and application of experiences and productive synergies for the ICM Group.

Being aware of the ongoing market evolution and the resulting constraints, ICM has decided to propose and implement a competitive model based on the highest quality, as well as on professionalism, sustainability, and social responsibility. It achieves this goal by maintaining, on one hand, an effective integrated management system complying with the UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI 39001, UNI ISO 37001, SA 8000, UNI ISO 30415, and UNI PdR 125 standards and, on the other hand, a corporate organization system complying with the Italian Legislative Decree 231/2001 based on internationally recognized ethics and compliance principles. It aims at ensuring the ongoing quality of its services and the compliance of its activity with the provisions of the laws in force, with the RTS (Road Traffic Safety) objectives it has set, with the ILO (International Labour Organization) international conventions and the IFC (International Finance Corporation) guidelines, as well as with the contracts in force, with reference to the following **field of application**:

Design and construction of: civil works including protected real estate assets, infrastructural works for mobility, hydraulic network works. Installation of thermo-fluid and electrical technological systems. Management of activities as a general contractor carried out under TITLE III of the Italian Legislative Decree 50/2016 coordinated with the corrective Italian Legislative Decree 56/2017 and subsequent amendments (EA 28;35)

ICM has always been inspired by the principles of legality, honesty, fairness, transparency, inclusion, impartiality and confidentiality, as well as by the respect for human dignity, the individual rights and freedom, and the environment in which it operates. Moreover, it pays utmost care to the protection of occupational health and safety and of human rights with reference to both its employees and those who work within the competence field of the organization, as well as to road safety issues and to the prevention of corruption, which is subject to continuous and constant care in order to assure the identification and the compliance with the relevant requirements and with the applicable legislation and regulatory provisions.

The **primary goals** of ICM are oriented toward six main areas, namely:

1 – QUALITY

- the satisfaction of its customers and the quality of the provided services and products;
- the strict compliance with laws, regulations, regulatory obligations and standards in all Countries in which the company operates;
- the diligence and accuracy in the execution of tasks and contracts;
- the measurement of its own performance;
- the continual improvement through the proper management of any detected Non-Conformities;
- the training, professionalism and moral integrity of its employees. These principles are implemented by providing our personnel with the necessary knowledge, in order to allow them

to always work at the highest level of professionalism, safely and in full compliance with all laws and regulations, to assure the best possible quality level for the provided service.

2 – HEALTH AND SAFETY

- the strict compliance with laws, regulations, regulatory obligations and standards in all Countries in which the company operates;
- the promotion and dissemination of a safety and continuing education culture at all levels;
- the safeguard in terms of safety and health in the workplace, also with reference to the equipment, machinery and facilities made available;
- the safety guarantees not only towards employees, but also towards suppliers, subcontractors, customers and all other stakeholders involved;
- the reduction of hazards and the elimination of safety risks at the workplace, also with reference to occupational diseases;
- the active involvement of workers in the risk assessment and management processes;
- the mitigation of risks during travel, as well as the remarkable decrease of road accidents and fines incurred by the employees;
- the protection of the physical and moral integrity of all collaborators.

3 – ENVIRONMENT

- the strict compliance with laws, regulations, regulatory obligations and standards in all Countries in which the company operates;
- the promotion and protection of the environmental context in which ICM operates, involving also its customers, Suppliers, Sub-Contractors, Authorities, Involved Parties and other stakeholders;
- the responsibility towards the community in conducting activities with full respect for the environment, ecosystems, and biodiversity, for example by reducing the impacts of its production activities in protected areas and ecosystems;
- the protection of flora and fauna, particularly protected species, which are essential to ensuring biodiversity and the preservation of natural heritage;
- the accountability towards the community in conducting business in compliance with local and national communities, applicable regulations and other legal and non-legal requirements, while also monitoring, but without limitation, the impacts of business operations on local environment, i.e. dust, noise and odor emissions, accidental pollution, and road congestion;
- the promotion of a systematic and consistent reduction in energy and water consumption;
- the promotion of the use of energy from renewable sources, thereby minimizing the emission of greenhouse gases;
- the minimization of waste production by optimizing waste recycling and recovery;
- the use of innovative technologies and methodologies in work processes;
- the training of employees aimed at increasing awareness of the need to reduce the environmental impact of business activities;
- the reduction of potential negative impacts of business activities on the health and safety of customers;

4 – CORPORATE SOCIAL RESPONSIBILITY (CSR), DIVERSITY AND INCLUSION, GENDER EQUALITY

- the strict compliance with laws, regulations, regulatory obligations and standards in all Countries in which the company operates;
- ex-ante analyses and assessments of the social impacts associated with its activities and construction sites, through a structured stakeholder engagement process involving institutions, local communities and other relevant stakeholders, promoting principles of transparency, dialogue and active listening, with the aim of preventing, reducing and mitigating negative social impacts arising from operational activities;
- promotion, where feasible, of initiatives supporting the social, employment and skills development of local communities, enhancing the use of local workforce in line with the technical and organizational requirements of the projects, and operating in compliance with the traditions, cultures and socio-economic context of host countries, with particular attention to projects carried out abroad.
- the respect for and promotion of employees' rights, including adherence to established working hours, agreed-upon wages as set by the National Collective Labor Agreement (CCNL), and the social benefits granted to employees, ensuring all employees have equal career opportunities, access to training, recognition and compensation;
- the commitment to ensuring fair and dignified working conditions, by providing employees with a wage that supports an adequate standard of living (living wage), in line with the principles of decent work and social responsibility, and verifying compliance with this principle on an annual basis;
- the respect for and promotion of human rights, including those of external stakeholders, and management of potential impacts caused by business operations;
- the protection against children exploitation;
- the compliance with the principle of equal opportunities, by implementing effective measures to prevent any form of discrimination, harassment, or bullying related to gender or other personal characteristics;
- the protection against any kind of physical, psychological or verbal discrimination or abuse;
- the monitoring of direct and indirect impacts of its activities on the human rights of external stakeholders such as property/land rights, right to self-determination, safety rights, etc.;
- the social dialogue, through encouraging consultation and participation of workers and their recognized representatives, and through the collective agreements;
- the involvement of all the personnel in order to improve the "Social Performance";
- the awareness raising at all levels with actions aimed at overcoming "unconscious bias";
- the promotion of policies and actions with the aim of promoting equal opportunities, gender equality and a corporate culture that recognizes and values the importance of work-life balance;
- the enhancement and the continuous professional growth of human resources, ensuring equity and absence of bias from the early stages of recruitment, with the aim of ensuring access to the same opportunities for training, professional growth and remuneration while respecting individuality and emphasizing different potentials and talents;
- the assurance of equity in all relationships with employees and collaborators;

- the condemnation of any act of discrimination and encouragement of the reporting, by all employees, of any suspected discriminatory cases;
- the presence of secure and confidential procedures for reporting and handling incidents of harassment and violence;
- the dissemination at all levels of the organization of managerial and leadership styles that make inclusion the cultural reference model, also through responsible management of work teams, to increase sensitivity and awareness of the value of differences;
- the identification of any organizational, cultural and relational obstacles that prevent full labor inclusion, as well as the creation opportunities - both inside and outside ICM - including in terms of labor policies.

All of the above is applied with even greater attention when the company operates in Countries identified as "high-risk".

5 – ETHICS / ANTI-BRIBERY

- the strict compliance with laws, regulations, regulatory obligations and standards in all Countries in which the company operates;
- the fairness of ICM and the Group companies and the individuals that operate on behalf of them, taking decisions that affect the relationships with different stakeholders;
- the prevention of conflicts of interest affecting the individuals acting for and on behalf of ICM and the Group companies;
- the confidentiality of the managed information;
- the transparency and completeness in the management of information by all collaborators, who are required to provide complete, transparent, understandable, and accurate information;
- the protection of the value of fair competition and of the principles from which this latter should draw inspiration;
- the application and continual improvement of the Management System for the Prevention of Corruption, in accordance with UNI ISO 37001:2016;
- the guarantee of an adequate level of training and information to all personnel and their constant consultation for the purpose of improving the Management System for the Prevention of Corruption and of consolidating a social culture aimed at fighting against corruption;
- the condemnation of any act of corruption and the encouragement to all employees to report any suspected cases of corruption;
- the condemnation of any act of fraud and encouragement to all employees to report any suspected cases of fraud at the expense of stakeholders, for actions for which the company may be or is responsible;

6 – SUSTAINABLE PURCHASING

- The ethical sourcing, consisting of the evaluation and selection of subcontractors and suppliers who share and apply the same sustainability standards applied by ICM with reference to quality, environment, safety, ethics (including labor practices and human rights), inclusion, impartiality, and fight against corruption, by means of the dedicated supplier portal and other sustainability assessment tools being implemented;
- the adoption of a collaborative approach in dealing with subcontractors and suppliers, which are an integral part of the corporate sustainability strategy;

- the involvement of local communities through job offers and requests for quotations to businesses operating in the same area.

In a perspective of continuous improvement that is also tangible and measurable, **the primary quantitative targets of ICM** in the six areas mentioned above are as follows:

1- QUALITY	<ul style="list-style-type: none"> a) Maintain the number of qualified suppliers in the company's portal above 60% of the total suppliers during the 2026-2027 biennium. b) Maintain the "tender success rate," which is the percentage of tenders won out of the total tenders participated in, above 5% during the 2024-2025 biennium.
2- HEALTH AND SAFETY OF EMPLOYEES	<ul style="list-style-type: none"> a) Maintain a severity index (SI) for injuries that is lower than the INAIL index for the construction sector during the 2024-2025 biennium. b) Maintain a frequency index (FI) for injuries that is lower than the INAIL index for the construction sector during the 2026-2027 biennium.
3- ENVIRONMENT	<ul style="list-style-type: none"> a) Reduce electricity consumption for lighting the headquarters by at least 20% by the 2026-2027 biennium. b) Increase the consumption of "green" electricity by the 2026-2027 biennium. c) Promote the recovery of waste rather than disposal, with the goal of sending at least 50% of the waste produced during the year for recovery by the 2026-2027 biennium.
4- SOCIAL RESPONSIBILITY, DIVERSITY AND INCLUSION, GENDER EQUALITY	<ul style="list-style-type: none"> a) Ensure that the percentage of women in executive positions is higher than the average percentage of the ISTAT index for the construction sector (latest index update in 2023: 8.2%) by the 2026-2027 biennium. b) Ensure that the percentage of women among total employees is higher than the average percentage of the ISTAT index for the construction sector (latest index update in 2023: 10.6%) by the 2026-2027 biennium. c) Verify that 100% of employees receive a wage exceeding the living wage by the 2026-2027 biennium. d) Ensure the absence of reports concerning child labor, forced labor, and human trafficking by the 2026-2027 biennium.
5- ETHICS / ANTI-BRIBERY	<ul style="list-style-type: none"> a) Record zero cases of corruption during the 2026-2027 biennium. b) Ensure that 60% of employees (executives, managers, and staff) receive training on anti-corruption by the 2026-2027 biennium..
6- SUSTAINABLE PURCHASING	<ul style="list-style-type: none"> a) Ensure that 100% of the suppliers registered on the portal sign the supplier code of conduct by the 2026-2027 biennium.. b) Ensure that at least 50% of first-tier suppliers have an ESG rating by the 2026-2027 biennium..

This policy is disseminated to all our employees when they are hired or begin working with the company and, by **signing the hiring letter/contract the employees accepts it in its entirety**. The policy is also made available to all stakeholders on the corporate webpage, besides being posted on the corporate and construction site bulletin boards.

The Company reserves the right to implement **disciplinary measures for confirmed violations** of the provisions in this document, in accordance with the ethical code and the sanctioning system outlined in the Organization, Management, and Control model.

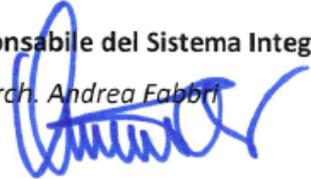
The Company makes every effort to ensure that this corporate policy is effectively implemented, subjecting it to **periodic reviews (at least every year)**, also through the verification activities foreseen by the Integrated Quality, Environment, Safety, Road Safety, Prevention of Corruption and

Social Responsibility System, as well as by the Organization, Management and Control Model, in order to pursue the continuous improvement. **The person in charge of this policy**, as well as of the entire Integrated Management System, **is Mr. Andrea Fabbri**.

Thanks to this policy, ICM is in a position to offer a highly qualified and competitive activity and to play a leading role in the realization of important works in the construction industry.

Il Responsabile del Sistema Integrato

Arch. Andrea Fabbri

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L'Amministratore Delegato

Ing. Dorik Gastaldello

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