

INTEGRATED POLICY FOR QUALITY, ENVIRONMENT, INFORMATION SECURITY SYSTEM INTEGRATED POLICY; HSE AND CORRUPTION PREVENTION

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1. PURPOSE OF THE DOCUMENT AND SCOPE OF APPLICATION

This document describes the Quality, HSE, and Corruption Prevention Policy adopted by Gridspertise S.r.l. and its subsidiaries (hereinafter referred to as Gridspertise).

This document applies to Gridspertise.

2. DOCUMENT VERSIONS MANAGEMENT

Document version	Revision description
No. 1 of March 27, 2023	First issue This version revokes and replaces previous Organizational Policies or Procedures applicable and/or adopted by Gridspertise in the definition of the Integrated Policy.
No. 2 of October 10, 2024	Second issue. Integration of ISO 27001 references

3. UNIT RESPONSIBLE FOR THE DOCUMENT MANAGEMENT

Prepared and approved by:

- Health, Safety, Environment and Quality

Authorized by:

- People and Organization
- Legal and Corporate

Records and update:

- Health, Safety, Environment and Quality (HSEQ)

4. REFERENCES

Current reference corporate and organizational documents are listed below.

- Organization and Management Model under Legislative Decree 231/2001 adopted by the Company
- "Gridspertise Global Compliance Program" (GGCP)
- Policy no. 1: "Code of Ethics of Gridspertise S.r.l.;"
- Policy no. 2: "Human Rights"
- Policy no. 3: "Zero Tolerance to Corruption (ZTC)"
- Policy no. 4: "Workplace Harassment Policy"
- Policy no. 5: "Whistleblowing Policy"
- Policy no. 6: "Diversity and Inclusion"
- Policy no. 7: "Corruption Prevention Policy"
- Quality, Environment, Information Security Integrated management system; HSE to prevent corruption

5. ALLOCATION ON PROCESS MAP

- Value Chain Stage/Process Area: Health, Safety, Environment and Quality
- Macro Process: Integrated Management System
- Process: Integrated Management System Policy

6. DEFINITIONS AND ACRONYMS

Terms and acronyms	Description
Corruption Prevention Compliance function	Corruption prevention function, i.e. a person or people with responsibility and authority of anti-corruption management system (ISO 37001 – Ref. 3.8)
Gridspertise	Gridspertise S.r.l. and subsidiaries.

7. INTEGRATED MANAGEMENT SYSTEM POLICY

Gridspertise activities include research, development, manufacturing, and subsequent marketing, including technical support, of equipment and technological solutions for electricity meters remote management, advanced network automation and other applications in the electrical power sector including field operations and IoT (Internet of Things) systems support technologies for the management and analysis of electrical data.

Gridspertise has adopted innovative methods that make their activities and marketed equipment to connote with sustainability thanks to their modern circular economy design and building techniques aimed to minimize environmental impacts.

Gridspertise has undertaken to increase customer satisfaction, safeguard the health and safety of all people involved into or influenced by its activities, providing safe, healthy and sustainable working conditions and appropriate and adequate tools, to protect the environment and biodiversity, as well as prevent and combat all types of corruption in accordance with the "Code of Ethics", "Zero tolerance to corruption plan" and the guidelines adopted.

By implementing an Integrated Management System in compliance with international standards ISO 9001, ISO 14001, ISO 27001, ISO 37001 and ISO 45001 and based on the principle of continuous improvement, Gridspertise S.r.l. systemically manages risks to protect its customers and stakeholders and is constantly committed to ensuring full compliance with standards, laws and other major requirements.

Gridspertise using its Integrated Management System as a fundamental tool for staff involvement and continuous improvement of its business activities, has identified its "compliance function" in charge of corruption prevention vested with full authority and independence, and ensures that all appropriate information and resources are available to this function, undertaking to conduct periodic checks that the policy principles remain in line with the strategic objectives and guidelines adopted by the Company.

IN LINE WITH THE ABOVE PRINCIPLES, GRIDSPERTISE S.R.L COMMITTS TO:

- A. Always pay constant attention to Customers, in the spirit of long-term partnership, and to those involved in the activities, ensuring compliance with high quality standards;
- B. Accurately select and monitor suppliers, verifying their activities to ensure the expected quality levels and aligning their operational health, safety, environmental and ethical standards with those of Gridspertise;
- C. Protect the environment, preventing pollution and reducing environmental impacts through the application of the best available technologies and circular economy method;
- D. Ensure business development sustainability, promoting the involvement of employees, customers and stakeholders to generate shared value for communities, future generations, and Gridspertise;
- E. Constantly evaluate HSE-related hazards for workers and the environment by adopting a systematic approach to eliminate such hazards or, when impossible, mitigate them trying to achieve "zero accident" objectives;
- F. Safeguard the confidentiality, integrity and availability of managed information by applying a risk-based approach in line with both business and regulatory requirements;
- G. Increase the awareness and competence of its employees, through training, participation and consultation, promoting continuous professional improvement;
- H. Prohibit and actively engage in the prevention of any behavior of bribery or attempted bribery;
- I. Encourage the reporting of alleged corruption, making the misbehavior reporting tools available to employees and stakeholders and protecting whistleblowers from potential retaliations, and prosecute any behavior that does not comply with the anti-corruption policy, using, among other things, the sanction system prepared by the Gridspertise People and Organization unit.