



The company **BETON BLACK S.P.A.**, operating in the sector of *Production, sale, and laying of industrial asphalt concrete* (for UNI EN ISO 9001:2015), *FPC Manual of aggregates and asphalt concrete* (for EU Regulation 305/2011), recognizing the importance of correct and transparent management of its human resources, and raising awareness among Management, suppliers, employees, and external collaborators regarding compliance with the Social Responsibility principles established in the SA8000 Standard, for energy in compliance with the requirements of ISO 50001:2018, for the environment ISO 14001, EMAS regulation, for road safety ISO 39001:2016, and for OHS (Occupational Health and Safety) ISO 45001:2023, through the adoption of an Integrated Management System, hereby commits to:

- Not using child labor or forced labor;
- Complying with current national legislation, international conventions, and recommendations, including resolutions from international bodies such as the ILO (International Labour Organization) and the UN (United Nations Organization);
- Respecting freedom of association and the right to collective bargaining;
- Opposing all forms of discrimination and unequal treatment (during recruitment, remuneration, access to training, career promotions) based on race, nationality, religion, disability, gender, sexual orientation, union membership, or political affiliation;
- Condemning all illegal conduct that may conflict with physical and/or moral dignity or integrity;
- Fully and impartially applying the National Collective Labor Agreement to all personnel, punctually paying the established salary and making all relative social security, welfare, and insurance contributions;
- Guaranteeing the protection of maternity and paternity, as well as disadvantaged individuals;
- Promoting and improving the safety conditions and the physical and mental well-being of its collaborators through both preventive and corrective actions;
- Involving all suppliers of goods, activities, and services, along with their commitment to social responsibility by complying with all requirements of the reference standard;
- Developing and extending information, communication, education, and training processes, and promoting dialogue with interested parties to ensure an efficient and effective application of the integrated corporate system;
- Pursuing the best possible Occupational Health and Safety conditions and operating in compliance with those protective requirements that constitute a fundamental part of civil life, with reference to the principles of prevention and continuous improvement;
- Determining risks related to its organization/activities and their significant impact, and eliminating them or, where not possible, reducing them to a minimum, preferably by targeting their root causes;
- Reducing and eliminating potential accidents arising from work activities;
- Reducing and eliminating potential incidents;
- Preventing injuries and occupational diseases;
- Improving risk management with particular reference to construction sites;
- Ensuring that personnel are made aware of social responsibility commitments, involved in pursuing them, and instructed and trained to adopt behaviors consistent with these commitments;
- Increasing awareness levels to pursue effective preventive action;
- Maintaining an open and constructive attitude toward the public, Public Authorities, and interested parties;
- Defining procedures to ensure products comply with all specified requirements, thus guaranteeing compliant and repeatable results for every product in accordance with EU Regulation 305/2011;
- Creating value, sustainability, and safety through the integration of professionalism, competence, knowledge, involvement, and innovation by actively promoting ethical behavior;
- Guaranteeing and preserving the satisfaction and fulfillment of the needs of all interested parties (clients, staff, management, suppliers, community);
- Aiming for business continuity and the continuity of offered services;
- Achieving gender equality regarding the presence and professional growth of women within the Organization;
- Making the policy appropriate to the purposes and context of the organization;
- Making it supportive of its strategic directions;
- Spreading a culture of diversity and equal opportunities for all staff and collaborators, ensuring everyone is treated with dignity, respect, and fairness at all times;
- Creating a welcoming work environment free from any direct or indirect discrimination and any harmful behavior based on personal, social, political, and cultural diversity;
- Regularly monitoring gender equality indicators to define the most appropriate, timely, and effective actions to achieve set goals;
- Applying specific personnel management policies to ensure equity at all stages of the employment relationship, from recruitment to role assignment, career management, evaluation and professional development, pay equity, and termination of employment;
- Implementing internal and external communication policies aimed at pursuing gender equality, valuing diversity, and supporting female empowerment;
- Recognizing the value of work-life balance by developing parenting, care, and work-life reconciliation programs and initiatives;
- Applying strict policies to prevent all forms of physical, verbal, and digital abuse (harassment) in the workplace;
- Controlling or influencing, where possible, how the organization's products and services are designed, manufactured, distributed, consumed, and disposed of by adopting a life-cycle perspective;
- Maintaining a systematic approach to identifying, evaluating, and managing significant environmental aspects of activities, products, and services;
- Committing to limiting natural resource consumption (e.g., water, raw materials) and minimizing and best managing generated waste, favoring recovery where possible;
- Minimizing and managing atmospheric emissions to reduce any environmental impact;
- Preventing pollution;
- Meeting and maintaining compliance with all applicable compliance obligations (legal and other subscribed requirements) in environmental fields (as required by ISO 14001 and EMAS Regulation) and energy fields (ISO 50001);
- Maintaining a high level of transparency toward the public and authorities, particularly through the publication of the validated Environmental Statement, reporting key environmental performance indicators (e.g., energy consumption, water, waste, emissions) and reduction actions;
- Continuously improving energy efficiency and energy performance;
- Supporting design aimed at improving energy performance and purchasing high-efficiency energy products and services;
- Ensuring the measurement and monitoring of energy use, consumption data, and relative performance;
- Providing necessary resources to achieve energy objectives and targets and to continuously maintain and improve the Energy Management System;
- Integrating energy management into business decisions, including operating procedures and investments in new technologies;
- Spreading a culture of safety in terms of prevention and protection so that it is considered an integral part of work activity;
- Committing to the consultation and participation of workers and their representatives.

In addition to being constantly monitored periodically, these objectives are analyzed and reviewed during Management System Reviews by Management alongside Function Heads and/or Company Units. In this regard, the Company has prepared a specific document to set measurable objectives, targets, dedicated resources, monitoring methods and frequencies, and to establish new goals/indicators.

To achieve corporate goals, Management commits to:

- Ensuring the Policy is supported at all levels of the Company's organization;
- Providing the necessary resources to achieve process objectives and targets;
- Encouraging the continuous improvement of individual skills for every collaborator and employee (improving corporate climate);
- Periodically reviewing Company Policy to ensure its continued suitability;
- Maintaining a high level of competitiveness in the global market through an efficient organizational system;
- Maintaining a process-oriented approach and risk-based thinking;
- Identifying risks to address and opportunities to pursue;
- Continuously researching, verifying, and improving customer satisfaction through product and service quality, operational process verification, resource involvement, environmental impact mitigation, information security management, and energy performance improvement;
- Responding to Client requests regarding the Integrated System with Third-Party Certification;
- Maintaining and/or enhancing current employment levels through constant improvement of corporate operating standards;
- Complying with mandatory requirements and commitments undertaken with interested parties;
- Spreading a culture of quality, environmental respect, energy efficiency, information security, and social responsibility internally and externally;
- Promoting activities that guarantee continuous improvement;



- Ensuring Gender Equality by defining an action plan for its implementation, setting up a management model that ensures over time the maintenance of defined and implemented requirements, and measuring progress through specific KPIs in indicated areas (which will be reported in management system documents to track planned actions that provide real, concrete value to women in the organization, who are the true interested parties);
- Establishing specific policies for each phase of the Human Resources Life Cycle to prioritize gender equality at any time and under any circumstance of a woman's working life in the organization.

The dissemination/disclosure of Company Policy, as well as objectives, process targets, and implementation programs, occurs through the distribution of this document and Company Management System documentation.

This Policy:

- Is appropriate to the purpose and context of the organization and supports its Strategic Directions;
- Provides a framework for setting objectives;
- Includes a commitment to satisfy applicable requirements;
- Includes a commitment to continuous improvement of the integrated management system;
- Is available and maintained as documented information;
- Is communicated, understood, and applied within the organization and communicated to all personnel via noticeboard postings and dedicated training sessions;
- Is available to relevant external interested parties through publication on the official website.

The requirements and implementation methods of the Company Management System, contained in the System documentation, outline the Company's Corporate Policy. Full compliance is required from personnel within their respective duties and responsibilities, keeping in mind that compliance of performed activities is the specific task of the executor, not the inspector.

Reports can be sent directly to the Certification Body and Accreditation Body at the following addresses:

SI CERT

Email: reclamisa8000@sicert.net

SAAS Social Accountability Accreditation Services

Email: saas@saasaccreditation.org

SAI Social Accountability International

Email: info@sa-intl.org

Borgo S. Michele (LT) SS 148 Pontina Km. 78,100 May 5, 2026

Administrator

Federico BACCARI

Appendix C Integrated Policy Rev. 6 of May 5, 2026


Beton Black SpA