

# Integrated Policy

## QUALITY, SOCIAL RESPONSIBILITY, EHS, OHS, ADMINISTRATIVE RESPONSIBILITY OF LEGAL PERSONS, PERSONAL DATA PROTECTION AND BUSINESS CONTINUITY

This document has been approved by the Board of Directors of Lanzi Srl. The Chairman of the Board of Directors, Luigi Lanzi is responsible for its implementation and is supported by the Compliance department. In order to ensure that it is easily accessible and available to its stakeholders, the Environment Policy is published on the company website [www.lanzigroup.com](http://www.lanzigroup.com)

LANZI Srl, a company established in Turin (Italy) in 1978 and operating both within Europe and outside Europe, is a company working on the design, direct manufacture, management of manufacture by third parties, and marketing of:

- Personal Protective Equipment (PPE), work clothing for industrial use and accident prevention material
- electromechanical and electronic devices and apparatus for distribution, collection and management of materials and equipment in general

The guidelines that underpin LANZI are expressed in this Company Policy Document.

### COMPANY QUALITY POLICY

LANZI operates according to the guidelines of the UNI EN ISO 9001:2015 standard and its Quality Management System has been certified since 1996.

LANZI considers Quality and continuous improvement to be fundamental factors in all its activities, reflecting the unique way it manages the various processes within its organisation and the image of the Company in the eyes of its Customers.

To achieve this objective, LANZI has developed a Quality Management System, deployed as a set of objectives, organisational structures, accountability system, processes, means and resources to support the implementation of the company's Quality policy.

It has also adopted a system for monitoring business processes and related indicators in order to ensure their level of effectiveness and efficiency.

LANZI's Quality policy is based on the following guidelines:

- constant research and development of new products/services offered to the customer
- full compliance with international regulations to ensure products comply with required safety and reliability standards
- punctual deliveries and flexible logistics organisation

- continuous monitoring of customer satisfaction levels
- full accountability for all employees regarding the company's quality objectives, achieved through information and training activities, and applying a rewards system linked to performance assessments
- constant improvement of information systems, the level of company communications and the internal relations system
- careful selection and continuous monitoring of the Company's strategic suppliers
- involving its strategic suppliers in achieving the Quality objectives and therefore in the satisfaction of the end customer

### **SOCIAL RESPONSIBILITY**

LANZI considers Social Responsibility a determining factor in its mission and adheres to the principles and requirements of the UNI ISO 26000 standard, "Guidance on Social Responsibility".

Among its stakeholders, it recognises the community within the local environment it operates in, and is committed both to its contribution to safeguarding local artistic heritage and partnering with local Schools and Educational Bodies to host interns and hire young people.

### **HUMAN RESOURCES**

LANZI operates under fair market conditions, respecting the rights of the human person, with particular emphasis on the most vulnerable categories.

It fosters respect for the physical and cultural integrity of the individual in accordance with the UN Universal Declaration of Human Rights and undertakes to prevent any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs; among other things, the Company considers the following of utmost importance:

- respect for the rights of individuals, protecting their moral integrity and ensuring equal opportunities
- fostering a company culture and operational method based on achieving organisational well-being in internal and external working relationships
- ensuring wage conditions consistent with the contractual provisions and the level of organisational responsibility for every employee
- encouraging work rhythms that are consistent with employees' personal and family needs
- punishing behaviour directed at violating the dignity of the individual that causes deliberate, intentional and thoughtless humiliation, particularly sexual harassment, bullying and discrimination

LANZI recognises the particular importance of combating child pornography and, more generally, protecting children, adopting measures to oppose child labour

Its mission to offer substantial volumes of high quality products and services directly to industrial end users has allowed a flexible production and logistics supply chain to be developed, which can meet the demands of a constantly evolving market in a timely fashion. This has brought about the equally essential need to ensure that Customers can identify more competitive sources of supply in geographical areas with low labour costs. This has meant selecting and monitoring (through constant audits) Production Partners in Best-Cost Countries which can guarantee compliance with product specifications as well as sustainable environmental and social conditions on production sites.

Suppliers are required to: comply with the laws, regulations, customs and labour practices in force in their Country; prohibit any discrimination based on race, nationality, gender and religion when hiring Staff; prohibit the use of child labour or non-consenting prisoners in the performance of their activities. Strategic Partners are therefore required to operate in accordance with the principles described above.

## ENVIRONMENT, HEALTH AND SAFETY (EHS)

LANZI is aware of the impact that its strategic decisions, activities and products can have on the Environment, Health and Safety (EHS).

### a) ENVIRONMENT

Since the Company's activities do not involve emitting polluting substances into the air or discharging waste into the water system, LANZI operates in compliance with and promotes principles of environmental responsibility, precautionary principles, and environmental risk management. It ensures that the environment is safeguarded and protected and strives to continuously improve its own environmental performance, minimising risks relating to the activities it performs and the products/services it provides.

Specifically, LANZI acts to:

- use resources sustainably and constantly pursue targets to reduce its own energy consumption and the energy consumed by automated material management systems
- prevent pollution, including through the use of constantly maintained and cyclically replaced transport systems
- monitor the use of plastic and paper to ensure rational and efficient use, prioritising, where possible, recovery and recycling rather than disposal
- define procedures for managing environmental matters and separated waste disposal
- encourage its employees to actively participate in the aims of the Environment Policy and the relevant rules and procedures, through training initiatives designed to educate employees on their role in minimising the use of resources and minimising purchases

The need to ensure the conformity of products and services for a wide range of customers, including large multinational companies with complex requirements, with continuous organisational evolution and

geographical expansion, has led LANZI to adopt a development model based on a systemic vision of processes. Product design has been expanded to control the products' entire supply chain, from the choice of raw materials to manufacturing, use and maintenance in the field, and end-of-life disposal. Environmentally friendly materials and technologies are researched and used, with ever greater care taken to employ substances that are harmless to the health of workers involved in the production processes and in the use of the finished products.

Selection, certification and monitoring of Partners involves applying controls and supporting the development of training for management and employees with a view to eco-manufacturing co-design.

- As a result, LANZI:
- pursues respect for eco-compatible production cycles, stimulating the development of products with minimal environmental impact, including their packaging
- encourages the development and diffusion of environmentally friendly technologies, offering services that encourage methods for collecting and recovering materials (gloves and others) to maximise their regeneration potential or ensure absolute compliance in their disposal. Automated distribution therefore assumes a strategic role in the context of sustainability, allowing employers to ensure that the required materials are continuously available to workers and, at the same time, through real-time monitoring, eliminate waste resulting from collection of materials that are unallocated or surplus to requirements
- encourages raw materials and other materials to be purchased in accordance with the Green Procurement policy by favouring purchases linked to environmental improvement and prioritising recycled products

#### b) HEALTH AND SAFETY

Risk analysis continues to be the foundation of the technical process. To this end, LANZI uses its own exclusive Technology Laboratory, approved by one of the most important European Certification Bodies (Lyon CTC), which allows the gloves and clothing that it produces to be verified in terms of performance, and their usage conditions simulated, in order to develop new solutions and ensure compliance with specifications.

The well-being of end users, who place an ever greater emphasis on ergonomic factors, comfort and, above all, safety guarantees for the materials used, is an increasingly important final objective in the production process.

#### **SAFETY OF INTERNAL PROCESSES AND STAFF OPERATING WITHIN LANZI (OHS)**

The Safety of LANZI's processes and employees is a fundamental objective integrated in its Policy.

The Risk Assessment Document is constantly updated and has been structured to ensure maximum consistency between tasks and related risks.

Each employee is fully aware of the risks associated with their activity. The HR and OHS departments consider constant organisational analyses and the direct involvement of workers on safety issues, together with training and refresher training, as central objectives.

Constant monitoring of work environments leads to corrective and preventive actions, and verification of these actions is an integral part of the Management Review.

The safety objectives, shared among all departments listed in the relevant organisational chart, are a component of the Business Improvement Plan.

Security is managed from a PDCA perspective and, like all company processes, is based on the concept of risk-based thinking.

LANZI has adopted a Safety Emergency Plan as well as a Plan for prevention and management of environmental emergencies and the efficiency of the buildings where it performs its activities. *LANZI complies with the requirements of its own COVID-19 protocol for managing activities in the context of the pandemic situation.*

#### **ADMINISTRATIVE LIABILITY OF LEGAL PERSONS**

LANZI's operating procedures take the relevant context into account, paying particular attention to the associated risks. These are therefore integrated with the requirements of Legislative Decree 231 of 8 June 2001, "Administrative liability of legal persons, companies and associations, including those without legal personality".

A Code of Ethics has been drawn up in order to clearly and transparently define all the underlying principles and values held by LANZI in achieving its objectives. An Organisation and Management Model (OMM) has been prepared, in which:

- rules are defined for the Company's organisation and management, which must be observed in order to prevent crime
- rules are defined to ensure that effective adherence to the Model is monitored
- penalties are established for failure to comply with the Model

Relationships with Customers are based on fully satisfying their needs, with the aim to create a relationship inspired only by general values of honesty and professionalism.

Transparency in accounting and monitoring, and strict compliance with the laws and regulations in force, aim to prevent and manage financial and operational risks, including in relation to the use of public funding.

*Employees are trained and encouraged to report (WHISTLE-BLOWING) unethical and incorrect treatment by reporting any wrongdoing to the Supervisory Body*

#### **PROTECTION OF INDIVIDUALS IN TERMS OF PERSONAL DATA PROCESSING**

In line with the provisions of Article 6 of EU Regulation 2016/679, personal data is:

- processed in a lawful, fair and transparent manner with respect to the data subject (“lawfulness, fairness and transparency”)
- collected for specific, explicit and legitimate purposes, and subsequently processed [...]
- sufficient, relevant and limited to what is necessary with respect to the purposes for which it is processed (“data minimisation”)
- accurate and, if necessary, updated

LANZI has established a Voluntary Processing Register under which each employee is trained and informed about the data they are authorised to process according to their task.

### **BUSINESS CONTINUITY**

LANZI’s Management considers the adoption of a Business Continuity Management System (BCMS) to be a fundamental element of its strategy. It therefore:

- identifies the main internal Business Continuity roles, establishing a competent structure that deals with the management and implementation of Business Continuity within the company, and a predefined organisational structure for extraordinary management of emergencies and crises
- defines and disseminates the Business Continuity Policy, from which Business Continuity action strategies, guidelines and objectives are derived
- promotes an understanding of the company by identifying its key services and critical activities, as well as the resources required to maintain them
- submits the Business Development and Continuity Plan annually to its Board of Directors

Turin, September 2020

Chairman of the Board of Directors

Luigi LANZI