



# SUSTAINABILITY POLICY

## SCOPE

*“Sustainability is the “driver” of a continuous improvement process that guarantees results over time and the strengthening of its economic performance, reputation and the health and safety of its workers, as well as enabling it to meet its goals in the environmental and social spheres.”*

Amper-Auto s.r.l, while leading its own business development, considers it as indispensable the quality of its processes and products, the health and safety of employees, the care for environment, for people and for the Community as a whole, in order to guarantee the utmost effectiveness and efficiency in terms of processes and resources, in accordance with the most qualified international standards: the Sustainable Development Goals (SDGs) and the ESG factors guidelines.

With an integrated view, Amper-Auto is committed to manage its business in a sustainable way by means of the adoption of innovative solutions that help combining economic growth, social development and well-being, protection of natural heritage, respect for human rights and promotion of an inclusive culture. The goal is the management of its environmental responsibilities, both towards the Communities they act in and the future generations with a medium-long term view, with reference to environmental protection, to responsible use of natural resources, as well as to fight and adaptation to climate change.

For each of these areas, Amper-Auto identifies the most significant performance indicators, setting achievable improvement objectives and monitoring the achieved results.

It also requires its suppliers to guarantee full compliance with the principles set out in this Policy and in the Code of Ethics.

The commitments contained in this Policy are proportioned to the human and financial resources available and define the targets for continuous improvement, implementing procedures, rules and instructions aimed at ensuring that the expressed values are reflected in the behavior of employees and collaborators, ensuring generations of today and tomorrow conditions and tools for a better quality of life.

This Policy is available to all interested parties through publication on the company website.



## ENVIRONMENTAL

Amper-Auto is committed to managing and reducing environmental impact by implementing a process of continuous improvement based on respect of regulations and voluntary commitments in four areas of intervention: climate change, air quality, resources and environmental compliance.

Amper-Auto applies 5 fundamental principles upon which bases its decision-making processes and defines the performances: leadership, applicable rules and laws, environmental protection, stakeholders involvements and constant progress.

The management aimed at reducing the environmental impact throughout the life cycle of activities, products and services, as long as it is economically sustainable, is one of the priority objectives of Amper-Auto strategy which includes the progressive integration of renewable energy, decarbonization, sustainability criteria for supply chain, resources and improved energy efficiency.

In particular, our Environmental Policy is focused on:

- reduction of energy consumption through more efficient production processes;
- reduction of greenhouse gas emissions;
- prioritization of usage of energy coming from renewable sources aiming to carbon neutrality;
- usage of raw materials and products with minor environmental impact, by removing substances deemed as dangerous along products entire life cycle;
- reduction of fresh water consumption;
- improvement of air quality;
- correct management of chemical substances;
- promote investment initiatives aimed at reducing environmental impacts, consumption of natural resources, minimizing soil erosion, maintaining its fertility and reducing the deforestation, protecting biodiversity and animal welfare in its ecosystem, based on risk assessment and environmental opportunities;
- keeping noise exposure to minimum levels, so to safeguard health and well-being of people and surrounding environment;
- reduction of waste, recurring as much as possible to recycling and reuse of used materials and their correct disposal, with a perspective to moving closer to a circular economy principle;
- selection of suppliers who also take into account aspects relating to their environmental performance through the adoption of environmental management systems;
- staff information and training sessions;
- dialogue and collaboration with the stakeholders to support initiatives for the protection and recovery of environmental heritage, training and information on environmental topics.



## HEALTH AND SAFETY IN THE WORKPLACE

At Amper-Auto, our top priority is the safety and well-being of our employees. We are dedicated to creating and maintaining safe workplaces that prioritize the health and safety of all team members. To achieve this, we adhere to a set of principles that guide our operations and decision-making. By prioritizing safety, we can ensure that our team can work efficiently and effectively, without compromising their health or risking injury. We firmly believe that a safe workplace is a productive workplace, and we are committed to upholding this standard for the benefit of our team and business by means of the following principles:

- comply with the signed provisions and act in accordance with current legislation on health and safety at work;
- promote the commitment to the prevention of accidents and occupational diseases through preventive actions;
- make the necessary and suitable personal protective equipment (PPE) available to workers. Raise awareness and provide adequate training to all interested personnel on the correct use of the provided PPE;
- favor collective protection measures over individual protection measures;
- keep constantly updated risk assessment, rules and procedures for each activity involving risks, in order to ensure the highest level of safety and well-being in all areas;
- design and manufacture machinery and equipment, systems and workplaces, operating methods and organizational aspects in order to safeguard the health of workers, Company assets, third parties and the community. Respect the ergonomics of workstations and reduce the effects of monotonous work and repetitive movements;
- regularly carry out regular maintenance of workplaces, equipments and systems, with particular attention to safety devices, in accordance with the manufacturers' instructions;
- identify and limit the use of chemical, physical and biological agents considered dangerous in the workplace, replacing them with safer alternative products and technologies;
- identify roles and responsibilities within the organization and assign the resources necessary for the planning and the implementation of programs aimed at achieving the objectives related to worker health and safety;
- spread informations relating to prevention in a transparent and effective manner;
- keep tools and workplaces technologically updated in order to make them safe;
- promote the involvement of those responsible for risk prevention and protection in internal safety audits, meetings, inspections and training activities on health and safety prevention;
- prepare employees to intervene in abnormal and emergency conditions quickly, effectively and diligently, in order to minimize any consequences;
- raise awareness and inform all workers of external companies on the need to respect the safety and hygiene standards applicable to the carried out activities;
- adopt the necessary measures for fire prevention and evacuation of workplaces, as well as for cases of serious and immediate danger;
- inform, teach and train all staff on prevention and protection of their own and others' safety during work activities, developing risk awareness and promoting responsible behavior on all collaborators;



- make people with disabilities and pregnant women safe from high-risk work situations by removing or reducing workplace health and safety risks, including those associated with their jobs.

## CORRUPTION PREVENTION

An ethically responsible conduct, permeated by values of loyalty, correctness and transparency, constitutes one of the main success factors of Amper-Auto. It is our responsibility to operate in compliance with the rules, distinguishing ourselves as a company capable of exporting the values that permeate our actions.

Countering corruption, rejecting it in every context, in any form or way, constitutes a concrete commitment. Knowledge of the areas in which the risk of corruption lurks and being the spokesperson for exemplary conduct must continue to distinguish our daily commitment to protecting the most precious asset: our integrity.

Amper-Auto therefore undertakes to:

- maintain a behavior based on criteria of correctness, loyalty and moral integrity that fights corruption;
- comply with all laws, rules and regulations regarding the fight against corruption;
- lead its activities in such a way as not to commit any act of corruption, whether direct or indirect, avoiding involvement in illicit situations, both with public and private entities;
- pursue any behavior that does not comply with this policy through appropriate disciplinary actions;
- comply with the provisions of our Code of Ethics, the procedures and the protocols defined for compliance with the reference regulatory framework on anti-corruption.

## SOCIAL RESPONSIBILITY

Amper-Auto supports the respect for human rights by contributing to the well-being of the Society through the development of innovative technologies and products that meet the requirements and guiding principles on human rights and business management. Specifically, it promotes its responsibilities by respecting the following general principles:

- respect human rights by observing and fulfilling the social responsibility obligations and national laws. Prevent its operations and commercial relationships from involving the company in negative social impacts;
- respect human rights as outlined in the International Charter of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- ensure the absence of any threats of harsh or inhumane treatment towards workers and prevent violence, gender violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shame, or verbal abuse in the workplaces;
- provide training to staff and increase awareness and social responsibility in order to pursue the commitment expressed in the Policy;



- involve the supplier chain through the diffusion of the Code of Ethics so that human rights are respected and protected;
- carry out periodic health surveillances, at the company's charge and through a qualified competent doctor, for any job that involves health risks;
- protect the right to maternity and paternity, reconciling family-work relationships;
- ensure correct industrial hygiene, providing free access to clean toilets, drinking water, hot water and adequate lighting. Provide suitable areas for storing personal effects, re-heating, storing and consuming food.

## LABOR POLICY

An essential element of its business activities is to improve people's job placement. The disclosure and respect of these principles extends to all workers:

- provide all workers, including new hires, with an employment contract that contains a description of the terms and conditions of employment, in accordance with local legislation;
- prohibit forced, bonded (including debt bondage), exploitation, slavery, or trafficking in persons, including transportation, recruitment of persons by threat, force, coercion, kidnapping, or fraud for labor or services;
- allow voluntary interruption of work performance, granting workers the freedom to leave work at any time in accordance with company procedures, or to terminate their employment relationship without penalty if reasonable notice is given as required by the employment contract;
- protect, detain or otherwise destroy, hide or confiscate workers' identity or immigration documents;
- prohibit child labor (refers to any person under the age of 15, or under the age to complete compulsory schooling or under the minimum age for employment in the country);
- respect the maximum working hours established by local law and in any case do not exceed 60 hours per week, including overtime on a voluntary basis, except in emergency or unusual situations, allowing at least one day off for every seven worked days;
- ensure compensation paid to workers complies with all applicable wages laws, including those relating to minimum wages, overtime hours and statutory benefits. In accordance with local laws, pay overtime at rates higher than normal hourly rates;
- offer equal opportunities in every aspect of working life, in the selection phases as well as in decisions regarding remuneration, assignment of tasks, training and career progression;
- promote gender equality and freedom of association;
- prohibit salary deductions as a disciplinary measure.

## INCLUSIVE AND DIVERSITY CULTURE POLICY

Diversity, equity and inclusion are the source of Amper-Auto's innovation and growth: there is a place for everyone, without prejudices regarding differences in age, gender, sexuality, family status, disability, race, nationality, ethnicity and religion.



Amper-Auto is committed to respecting, valuing and embracing diversity as a tool to ensure market knowledge, to create better ideas and to drive innovation that contributes to the sustainable growth of the Company, ensuring that each employee meets its needs in a fair manner for all, respecting one's diversity. It also undertakes to respect, listen and involve every person to encourage a workplace where employees feel accepted, appreciated and free to contribute and express themselves to achieve ever better results.

## PERSONAL DATA PROCESSING

Amper-Auto is aware of the importance of guaranteeing adequate protection to the subjects involved in personal data processing operations: it intends to provide directors, employees and all those who represent the company towards third parties with indications regarding the fundamental principles of conduct which they must comply with when scope of the processing operations carried out.

The processing of personal data must comply with the following general rules:

- respect the assumption of legitimacy, the applicable laws and the principles of correctness;
- communicate in advance to the interested parties the purposes of personal data processing;
- process personal data for a period of time not exceeding that required to pursue the purposes;
- inform on the processing of personal data and, if necessary, request the prior consent of the interested parties;
- allow interested parties the right, within the limits established by applicable laws, to have confirmation of the possible existence and type of personal data concerning them, to know the origin of the same and the subjects or categories of subjects to whom the data may be communicated to, to request the updating, rectification or integration, and if the conditions are met, the cancellation, as well as to oppose for legitimate reasons the carrying out of certain processing operations;
- adopt the most appropriate security measures, in accordance with current laws and company policies, in order to ensure the protection of personal data, aimed at preventing the risks of loss, destruction or unauthorized access to them.

## CYBERSECURITY POLICY

Amper-Auto guarantees consistency and compliance with the applicable legal, regulatory and contractual requirements for the security of information systems. In particular, it defines the key characteristics of information that make it valuable to the organization:

- “Confidentiality”, understood as the ability to guarantee access or disclose information only and exclusively to individuals, entities or processes authorized to access it;
- “Integrity”, understood as the ability to safeguard the accuracy and completeness of information over time;
- “Availability”, understood as the ability to make information available, accessible and usable with the times and methods required by an authorized body. These principles provide a model for managing the risks that can affect corporate information and IT assets (applications, services, infrastructures or other components that



manage information), protecting them from any threat, both internal and external, intentional or accidental. To ensure adequate management of IT Security, in compliance with the aforementioned principles and with a structured approach, it is necessary to take into consideration the following dimensions and balance them correctly to create a solid and secure framework;

- People (human capital that performs tasks described within the processes);
- Processes (set of steps or actions that together allow a specific objective to be achieved);
- Technologies (set of tools that people can use to automate or implement processes);

This Policy is complementary to the “Personal Data Processing Policy”: it requires that its staff, its suppliers (together with their subcontractors), collaborators and any third party that manages Amper-Auto's data, information or information systems complies with the principles of this Policy and with applicable laws and regulations.

## FAIR COMPETITION POLICY

Amper-Auto operates in compliance with the principles established by national and international regulations aimed at protecting free competition and, therefore, in carrying out its business, it operates by promoting fair competition. The company recognizes that fair and fair competition constitutes a fundamental element for the development of the company and the market and is also aware of:

- the commercial, patrimonial, reputational and operational risks that would derive from the absence or inadequacy of organizational rules and safeguards aimed at guaranteeing compliance with the principles protecting free competition;
- the serious consequences that would derive from the violation of competition rules (financial sanctions, nullity of agreements, civil actions for compensation for damages, criminal liability, etc.) and consequently, the importance of implementing adequate antitrust compliance activities . For this reason, Amper-Auto defines the principles with which the subjects indicated below must comply, as well as the behaviors that must be observed to guarantee compliance with the same. This Policy is aimed at directors, employees, consultants and all those who work in favor of the Company.

Amper-Auto adheres to the following general principles:

- defines and pursues its commercial policy in total autonomy compared to competitors on the market;
- operates exclusively on the basis of its own strategic and commercial choices;
- does not engage in illicit conduct in particular: or both horizontal (between competitors) and vertical (between subjects operating at a different level of the distribution chain) agreements which consist of agreements, concerted practices or decisions of business associations with which two or more companies adhere to a common strategy suitable for limiting their autonomous behavior on the market and which has the object or effect of preventing, restricting or distorting competition in the specific market; or acts of abusive exploitation of a dominant position, if held by Amper-Auto in a specific market; or concentration operations: which require the prior authorization of the competent antitrust authority without having obtained such authorization; or exchanges of confidential information with its competitors except within the limits of what is permitted by applicable legislation and on the basis of confidentiality contracts previously stipulated between the interested parties.