

POLICY AND OBJECTIVES

HEALTH AND SAFETY, SOCIAL ACCOUNTABILITY, ENVIRONMENT, ENERGY, INFORMATION SECURITY, QUALITY AND BIM METHODOLOGY

The integrated policy defined by the Management Committee of the SEINGIM Group constitutes the foundations of the management system for Health and Safety, Social Responsibility, Environment, Energy, Quality and BIM; politics provides the framework for achieving objectives and consolidating the image of the group by strengthening its identity.

The SEINGIM Group wants to be among the leading engineering, management, *training*, works management and commissioning service companies at a national and international level, committing itself every day to developing and improving its capabilities to offer innovative and integrated products/services to its customers with the aim to consolidate and strengthen its leadership in the reference markets by creating conditions to guarantee the protection of the environment, the health and safety of its employees and collaborators, the information security, the safety of the products resulting from its engineering by implementing socially responsible commercial practices.

The companies of the SEINGIM Group carry out their activities in accordance with the Vision, the Mission and the values indicated in the ethical and organizational code, adopting the criteria of conduct and the principles of correctness and transparency which contribute to orienting behavior towards the principles of social responsibility and of the sustainable development of environmental protection and improvement, of the protection of Health and Safety in the workplace, of quality and continuous improvement, of technological innovation and the efficiency of all services provided, ensuring its contribution to the development of the territories in which they operate, aiming for the most complete and total conformity of the products and services to achieve the satisfaction of the stakeholders, in particular of their Customers, aiming for the most complete and total conformity of the products and services provided to the contractual needs of the Customers.

This is the premise for company development according to internal organizational rules capable of continuously directing the entire range of phases of its processes, giving particular attention to those that have the greatest influence on the qualitative level of performance.

SEINGIM considers **information security** an **essential factor** for safeguarding its own information assets and those of its clients. Furthermore, it views information security as a **strategic advantage** that can be readily leveraged in the provision of services.

The pillars on which the SEINGIM Group bases its strategy aim to:

- the promotion of **leadership** as one of the management principles of the group's companies;
- compliance with applicable laws and regulations (**legislative compliance**) which are also inspired by the criteria of correctness, loyalty and moral integrity regarding the **prevention and fight against corruption**, in Italy and in any country where SEINGIM operates, with the involvement of employees, collaborators in any capacity, and all subjects who operate in favor and/or under the control of SEINGIM;
- compliance with the standards identified in the Integrated Management System (Health and Safety, Social Responsibility, Environment, Energy, Quality and BIM), and with the tools of the **International Labor Organization**;
- adopt a **risk-based thinking approach**, and therefore promote a common risk management model based on a continuous analysis of the organisation's context, the needs and expectations of interested parties aimed at reducing the impact on the company by conducting proactive actions;
- ensure an increasingly high level of health and safety in every activity that involves risks to the health and safety of employees at work, through the consolidation of the culture of risk management, prevention, ensuring protection measures and implementing monitoring and analysis of the effects achieved with the aim of **zero accidents and environmental incidents**;

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Classification: ☒ PUBLIC ☐ PRIVATE ☐ SHARED PRIVATE ☐ CONFIDENTIAL



- establish **responsibilities and procedures** to ensure **adequate management of direct and indirect health and safety aspects** relating to the activities of the SEINGIM Group and implement adequately to ensure that psychotropic substances are not used in all workplaces which could compromise the work performance and safety of workers;
- promote internal health and well-being to guarantee the conditions for the development of human capital in compliance with mandatory laws and regulations in the **management of health and safety in the workplace**, aimed at protecting, defending and safeguarding the physical and mental well-being of each worker;
- **protection and safeguarding of the environment**, the prevention and reduction of environmental aspects in normal, abnormal and emergency conditions;
- implementation of measures aimed at **preventing environmental accidents (pollution)** and, in the event of an occurrence, guaranteeing an adequate response;
- implementing correct management of **urban and special waste** deriving from its activities, minimizing its generation and ensuring its **recycling and/or disposal**;
- guarantee sustainable management of natural resources, **combating the loss of biodiversity and protecting environmental and cultural assets**;
- protect the environment, with **sustainable development, reduction of pollution** and optimal use of resources through the control of significant environmental impacts deriving from its activity, reducing waste and rationalizing the use of natural resources, favoring, where possible, the public transport for work trips;
- management and **improvement of energy efficiency** through the evaluation and monitoring of energy consumption deriving from process activities and the implementation of projects to improve the related performances aimed at the rational use of energy aimed at reducing the **Carbon Foot Print** of SEINGIM companies in the different contexts of the different activities;
- support a **rational use of energy**, so that the SEINGIM Group is able to maintain and continuously increase its efforts to obtain better energy performance and reduced energy use, also thanks to the definition of energy objectives and goals;
- incorporate energy efficiency issues into the decision-making process during **design development** by increasing, where possible, **Energy Saving** measures and promoting the use of renewable energy, **reducing CO₂ emissions**; proposing solutions on systems, equipment, products and services that improve energy performance;
- monitor compliance with all applicable requirements related to **energy aspects**, requested by customers, signed by SEINGIM Group companies or voluntarily;
- affirm through design activities a greater sensitivity towards the issues of **Social Responsibility (Social, Societal, Environmental)**, which at an environmental level, materialize in an increasingly green approach by defining sustainable models of production and consumption;
- **ensure an adequate level of information security** within the scope of data processing services. This involves identifying, assessing, and mitigating risks associated with the underlying processes supporting the services provided.
- **define a set of organizational, technical, and procedural measures** to guarantee compliance with the following fundamental security requirements:
 - **confidentiality**: it ensures the property of information to be known only to those with privileges

- **integrity**: it ensures the information is complete in its characterization and expression in terms of value and content.
- **availability**: it ensures the information is accessible and usable when required by processes and authorized users
- continuous reliability, operational continuity, safe use of available company resources, minimizing risks to maintaining the confidentiality of information, in relation to threats and vulnerabilities, guaranteeing the authenticity, integrity, reliability, readability and availability of documents stored in compliance with legislation applicable with a “**privacy by design**” approach;
- adoption and updating of a continuity and **disaster recovery** program for “business critical” processes in order to maintain or promptly restore the functioning of services following incidents;
- the will to actively contribute to sustainable development by adopting applicable **Sustainable Development Goals** in its business strategy, outlined in the **United Nations 2030 Agenda** to pursue an idea of sustainable design and at the service of communities in terms of energy, responsible consumption of resources and of urban regeneration;
- cultivate the value of culture and **dignity of work, inclusiveness, equality and non-discriminatory practices** at all levels of SEINGIM to contribute to the development of a non-violent and inclusive society based on legality;
- full compliance with the legislation in force regarding remuneration, working hours, disciplinary practices, ensuring **freedom of association and the right to collective bargaining for all workers**;
- absolute refusal to resort to forced or compulsory labor and the use of minors, with a commitment to adopt appropriate **remedial actions** in the event of such situations being encountered.
- guarantee the maintenance of the appropriate communication channels (SEINGIM¹ mailbox accessible from the website for dedicated communications; also, to the SQS² certification body or the Social Accountability Accreditation Services (SAAS³)) for reports from anyone who encounters problems or needs requests of in-depth information on the topics defined above, with SEINGIM's commitment to always provide adequate feedback;
- strengthen the role of the Seingim Group in civil society, through proactive and constructive actions, with the aim of promoting and encouraging the **cultural, social and economic development of the territory**;
- confirm the commitment to continue along the path of continuous improvement, monitoring progress, **publicly reporting the results and actively involving our stakeholders**.
- achieve **continuous improvement**, understood as a process of professional growth of human resources, of organizational, technological, technical, infrastructural and other conditions and of process performance in terms of effectiveness and efficiency and the dissemination of company best practices relating to the application contexts of the management systems adopted (Health and Safety, Social Responsibility, Environment, Energy, Information security, Quality and BIM);

¹ segnalazioniSA8000@seingim.it

² ignetld@ignet.ch

³ info@sa-intl.org



- provide **high quality, reliable and cutting-edge solutions and services**, to present ourselves to our Customers as a trusted partner by promoting the development of projects with the BIM Methodology;
- **encourage the exchange of information** and coordination between project groups, promoting and increasing collaboration between designers during the design process;
- use a variety of recent and innovative digital tools for collaborative design, to generate models that include information attributes (plans, reports, etc.) and to perform simulations and analyzes aimed at interpreting and **resolving conflicts within the federated model**;
- guarantee interoperability between different software platforms with the use of open formats (IFC);
- **acquire and maintain the necessary professional competence** through recruitment and training and education, training and information, employees motivation in all corporate areas, relevant to the company;
- **optimize the interaction** between the various **company processes**, for **efficiency and profit** and try to continuously improve the performance of the individual processes;
- **improve the effectiveness and efficiency** of company processes
- use **concrete data** to define objectives and evaluate their achievement
- **communicate clearly and effectively** with internal and external interested parties;
- **involve staff in achieving business objectives**, allowing them to acquire responsibilities, provide feedback, improve everyone's contribution and stimulate effective internal communication;
- **create an environment** that allows and **stimulates the best performance** from employees, consultants and suppliers;
- **balance operational results and resource expectations**, taking care of the professional growth of people and their involvement with the activities carried out and with the integrated management system;
- **valorising the resources in relation to the work carried out** and the commitment made, with the assignment of concrete recognitions diversified according to the various professional categories;
- **balance job satisfaction and private life of employees** and collaborators;
- **update the skills and knowledge of the Seingim Group staff**, based on the evolution of technologies, the reference context, the organization and the needs of its stakeholders
- define **KPIs** (Key Performance Indicators) and targets and monitor them periodically in order to continuously verify the performance of the Management System processes, the analysis of which constitutes part of the input for the periodic Management Review.
- establish and maintain profitable **partnerships with customers, suppliers and subcontractors** and adopt measures to ensure that quality, environmental and safety management standards are applied;
- to engage Suppliers in complying with the principles of the Integrated Management System (Quality, R&D, Environment, Energy, Bim, Social Responsibility and Information Security) to which the company adheres, including through audits by SEINGIM staff;
- guarantee **control of the entire chain of outsourcers and suppliers**, including those within the company, who support the services of the service management system;

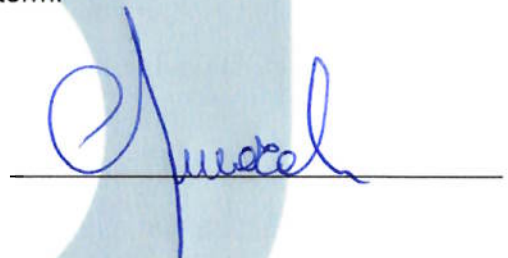


- **compliance with all controls established** for the process phases and the introduction of new controls for phases that reveal deficiencies in this sense;
- **improve internal efficiency** in order to limit process and organizational non-conformities as much as possible;
- improve the organization of work for the **rational use of resources** to provide technologically advanced and easy-to-use solutions;
- identify, **analyze and remove inconsistencies and eliminate possible causes of non-compliance**, through the implementation of planned and controlled measures;
- identify and **use opportunities to improve the integrated management system by capitalizing on positive experiences and lessons learned** by disseminating knowledge within the organisation;
- **increase the involvement and competence of its employees**, through participation and consultation, promoting the propensity for continuous improvement;

The SEINGIM Group Management Committee believes that harmonization with the requirements of the integrated management system is the best way to achieve the set objectives. Every employee and/or collaborator has the right and duty to implement the political principles adopted and to participate in the improvement of the quality system, environmental protection and management of health and safety at work (Health and Safety, Social Responsibility, Environment, Information Security, Energy, Quality and BIM). The integral application of standards in daily activity is a fundamental element for the sustainable development and success of company operations in the long term.

Sole Administrator

Fabio Marabese



In accordance with the Code of Ethics which guides behavior towards the principles of social responsibility and sustainable development, all the people who work in SEINGIM are aware of the commitments made and will support the principles of the Integrated Management System.

The Integrated Management Systems Policy is disseminated to all employees and collaborators of the SEINGIM Group; it is everyone's duty to actively collaborate, within their own sphere of competence, to improve the Management Systems. The Management Committee of the SEINGIM Group undertakes to provide the necessary technical, economic and professional resources, so that the objectives of this Policy are fully achieved, ensuring that through periodic verification activities, that this policy is understood and implemented by all functions corporate and that the declared objectives are pursued.

The Management Committee of the SEINGIM Group ensures that the Integrated Policy is made available to interested parties and to anyone who requests it. In particular, it is communicated to all employees, collaborators and stakeholders and published on the company intranet, website and social networks.

The Policy will be subject to continuous verification and will be re-evaluated at each annual Management Review.

