

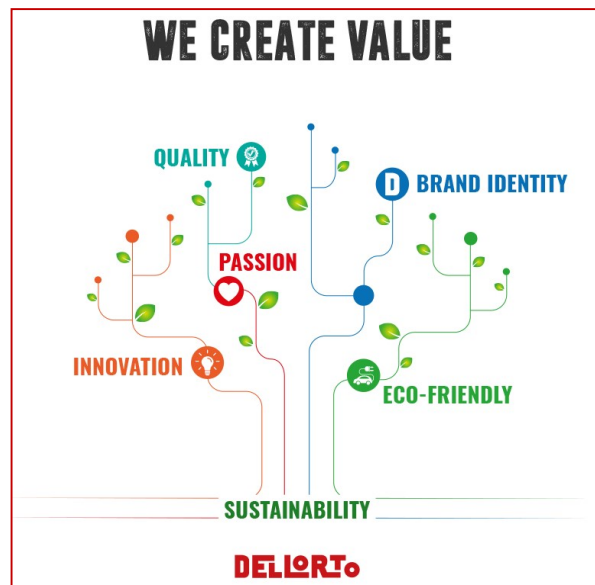


**Company Policy
for Quality, Environment,
Health & Safety
and Information Security**

Dell'Orto Spa is a company specialized in project, production and sale of components for propulsion systems in the automotive sector.

As a company that has operated on a global scale since 1933, thanks to a winning DNA made of **PASSION**, **INNOVATION** and **MOTORSPORT** Dellorto proposes itself as a **company of EXCELLENCE** capable of guaranteeing the maximum satisfaction to its own customers, though never neglecting its traditional values.

Dellorto's activities are founded on a culture and heritage of values that are acknowledged and shared by all employees and Companies, throughout the Group, forming a behaviour blueprint.



Dellorto's Mission is aimed at creating value through 5 development principles:

1. THE QUALITY OF PRODUCTS AND PRODUCTION PROCESSES

A “must” in the Automotive market. Dellorto is constantly committed to achieving both the highest quality and continuous improvement in performance and in products.

2. THE PRODUCT INNOVATION

By a know-how coming from processes which are almost exclusively run in house and supported by talented teams of engineers and technicians, projected towards the concept of sustainable mobility.

3. THE PASSION OF A FAMILY-OWNED COMPANY

Passion for Work, Territory and Motorsport.

4. THE BRAND IDENTITY

The acknowledgement of an over 90 years lasting story full of success in two and four wheels.

5. LONG TERM SUSTAINABILITY

“**SUSTAINABILITY**” for Dellorto means simultaneously striving for economic, social and environmental goals in a way that gives them equal priority. Dellorto wants to create enduring value, provide good working conditions and a positive influence on human rights, as well as handle the environment and the resources from a Life Cycle Assessment (LCA) perspective.

Dellorto implemented its own CODE of CONDUCT and a POLICY FOR SUSTAINABLE PROCUREMENT vis-à-vis its own suppliers, adopting the Business Model provided by Law Decree n°231/01.

Dellorto makes available on the company website any information interesting for its stakeholders.

Cabiate, 02/05/2023

President
Giuseppe Dell'Orto

Dellorto is committed to providing on time **THE QUALITY OF THE PRODUCTS AND OF PRODUCTION PROCESSES, creating** win/win relationships able to **meet their Customers' expectations**, the main automotive OEMs, **thus guaranteeing the constant progress of the company.**

For the above-mentioned reasons, the Company President has decided to implement, promote and support the activities of planning, implementation and maintenance of the Quality Management System in compliance with UNI EN ISO 9001 requirements and in accordance with **IATF 16949 Automotive standards**, integrating the above-mentioned system in business processes.

Based on this fundamental intent, here following the deriving objectives have been listed:

- the supply of products and services, 100% in compliance with the applicable laws and regulations in force;
- the full commitment to achieve the absolute quality standards - Km0 and in field Zero defects, and in compliance with the scheduled times, methods and costs: **TARGET 0 PPM, 0 PPM 3M in field and 100% SERVICE LEVEL;**
- the development of innovation-based solutions for the propulsion systems of the future: the main topics of product innovation concern sustainable mobility and include components and systems capable of standing as an effective contribution to de-carbonization and also able to support the electrification of propulsion units;
- the commitment to respect a sustainable development enhancing the 4 SUSTAINABILITY Pillars, as an integral part of the business (**ENVIRONMENT, LABOR and HUMAN RIGHTS, BUSINESS CODE OF ETHICS and SUSTAINABLE PROCUREMENT**).

For the full achievement of such targets, Dellorto is committed to promote and support the following activities:

- periodically re-examine the BUSINESS CONTEXT and the NEEDS/EXPECTATIONS of its own STAKEHOLDERS, consequently adapting its objectives and policies under the Company strategic guidelines, thus ensuring the full integration between Management Systems and the business process, guaranteeing the provision of appropriate resources;
- support and promote the CONTINUOUS IMPROVEMENT process by identifying, measuring and defining new targets for the appropriate pre-set KPIs assigned to each process within the Management System, assessing the effectiveness and efficiency of the actions undertaken based on a correct assessment of risks and opportunities (Risk Based Thinking);
- favour suppliers who have embedded sustainable and ethical practices by continuous monitoring of scorecards and continuous checks, in order for requisites to be complied on a “regular basis”;
- ensure the full involvement and training of all company functions and of very stakeholder engaged in understanding and responding to Customers' needs, by providing 0 defect products and services, in the right pre-scheduled time and by pre-established costs;
- support the leadership of management responsible subjects in order for them to be acknowledged, empowered and followed.

Cabiato, 02/05/2023



President
Giuseppe Dell'Orto

Dellorto is fully aware that the creation of long-lasting company values implies the respect and protection of the environment where it operates; this is why **LONG-TERM SUSTAINABILITY** is one of the company's guiding principles.

For this reason, our Company President has decided to adopt, promote and support the activities of planning, implementation and maintenance of the Environmental Management System in compliance with **UNI EN ISO 14001** standard.

The company is totally aware that by respecting the environment where it operates future generations will be less impacted, and therefore commits to respect and preserve natural elements such as air, water, soil and other natural resources.

For the achievement of such goal, the company engages to the measurement, monitoring, and analysis of:

- water quality and consumption;
- air quality within the production plant;
- emissions harmful to the environment and responsible for the greenhouse effect;
- energy consumption;
- excessive consumption of natural resources;

to reduce the environmental footprint through:

- management and Conservation of sustainable resources;
- management of the use of less dangerous chemical products and processes to mitigate the environmental impacts;
- constant measurement of company waste, and analysis of performance in waste reduction;
- analysis and monitoring and constant improvement of Air quality, sound, soil, subsoil and groundwater pollution levels;
- measurement of the energy efficiency and promote the use of renewable resources.


The company is committed to comply with its own regulations and to pursue continuous improvement of Environmental Management System in order to enhance its environmental performances, to minimise risks, and even to transform them into opportunities. In this regard, Dellorto has implemented a yearly based improvement plan aimed at establishing – based on the achieved environmental performances and on the information received from the stakeholders – the environmental objectives and their relevant KPIs. The Organization environmental performances are measured through a regular analysis of the concerned indicators:

- the consumption of energy, water and gas used for the production processes of each article;
- the company waste vis-à-vis the finished product total production process;
- the measurement of the level of waste recovery.

The full achievement of pre-set objectives can only be performed thanks to the contribution of each party, Dellorto is therefore aware that all company functions shall be involved, promoting workers' training and awareness, mainly focusing on the prevention and the elimination of the non-conformities, to the reduction of costs generated by them and to the protection of the environment from pollution.

Cabiato, 02/05/2023

President
Giuseppe Dell'Orto



Dellorto's workforce health and safety conditions are the company's main objectives. Legal compliance and the respect of applicable pre-requisites represent a fundamental condition to guarantee healthy and safety labor standards.

The achievement of the above objectives is performed thanks to the following recommendations:

- ensure the wellbeing of the workforce;
- comply with laws and regulations in force to fulfil any conformity obligations;
- eliminate danger and minimise risks concerning health and safety;
- prevent accidents and occupational illnesses;
- mitigate risks concerning professional activities and make adequate provision for the health and safety of employees, suppliers and contractors and others who may be affected by the company activities within company departments;
- ensure the availability of all the resources needed for the achievement of such objective.

Dellorto is particularly focused on the following areas:

- emergency preparedness and management response measures;
- management of incidents, near miss and accidents;
- safety measures for machines and plants;
- health and safety measures of the company workforce, by providing Personal Protective Equipment (PPE);
- picking, management, use, handling and storage of chemicals;
- ergonomic workplace design;
- fire protection equipment for facilities, machines and plants;

even in case of both new activities definition and for existing activities under review.

Dellorto requires all company directors, managers and workforce to perform a full compliance of company safety procedures, using all necessary PPEs, adequately handle, manage and store potentially dangerous substances (as defined in the applicable regulations), ensure each container of chemicals is identified by an appropriate name and symbol for hazardous substances.

Dellorto's safety performance is assessed through a periodical analysis of key indicators:

- full compliance with applicable laws and regulations;
- elimination of accidents at work and minimisation of serious accidents
- adopt the use of chemical substances that minimize the impact of health and safety for its users.

Dellorto requires all company directors, managers and workforce to be informed and appropriately trained on the prevention and protection measures to be applied to them and to any other resource with regard to health and safety in the workplace, raising awareness on the involved potential risks and promoting responsible behaviours to be performed by each and every company collaborator. These are considered as primary and key elements to be spread and disseminated within the whole company and to all recipients as fundamental company principles, guidelines and the implementation measures of the Health and Safety Management System in the workplace.

The company belief is that the involvement and the adherence of the workers to the company principles with regard to the safety management system, can be continuously and successfully improved. Any material, actual or potential report on dangerous must be promptly processed in order to adopt preventive measures and undertake corrective actions.

Cabiate, 02/05/2023



President
Giuseppe Dell'Orto

Dellorto is aware that the **strict confidentiality of business secrets and sensitive information details** and the relative security measures to be adopted assume a **strategic value in competition between companies**: the protection of the value of the corporate assets made up of **know-how**, data and services, methodologies and tools used for business development has a STRATEGIC aspect.

For this reason, Dellorto has decided to ensure the adoption of all the measures necessary to guarantee the security of this heritage, through the implementation of the Information Security Management System in compliance with the **UNI EN ISO 27001** standard and with the specific requirements of the customers.

Dellorto's main mission in this regard is to ensure:

- **information confidentiality**: i.e., information details must be accessible only to authorized recipients;
- **information integrity**: i.e., information must be disseminated only complying with the highest level of precision and completeness and in the full respect of its processing methods;
- **information availability**: i.e., authorized users must be authorized to access information and assets upon request;
- **information control**: i.e., ensuring that information management always takes place through secure and tested processes and tools;
- **information authenticity**: i.e., guaranteeing a reliable origin of the information.

Dellorto is aware that the absence of adequate levels of security can lead to damage to the organization's activity, lack of customer satisfaction, the risk of incurring penalties related to the violation of current regulations as well as damages of economic, financial and corporate image nature as well as process functioning. For this reason, Dellorto actively supports the company security through a clear direction, a clear commitment, explicit assignments and the acknowledgment of responsibilities relating to the information security.

Dellorto ensures these commitments by the application of the measures here below:

- promotion and application of Information Security Management System complying with Security requirements as stated by international rules in force;
- accurate provisions for appropriate planning, implementation, organization, control, auditing, management and continuous improvement of all procedures in place;
- monitoring of threats to corporate key information data and analysis of security accidents, reviewing risk acceptance criteria and acceptable risk levels;
- activation of training programs to raise information security awareness and culture.

The Organization's information security performance is assessed through a periodic analysis of the specific indicators.

Dellorto grants an extremely high-level standard when dealing with personal data, thereby ensuring the company full compliance with GDPR.

Cabiato, 02/05/2023


President
Giuseppe Dell'Orto