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|---|----------------------|-----------|------------|----|---|
|  | <h1>QHSE Policy</h1> | Issue No: | 007        |    |   |
|   |                      | Amended   | 11.01.2023 |    |   |
|   |                      | Reviewed  | 11.01.2023 |    |   |
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We are fully committed to: “providing the best quality services to client’s requirements through continual improvement, minimizing damage to the environment and ensuring we reduce/eliminate accidents, incidents and non-conformances in accordance with maintaining a management system that is effectively promoted”.

We are always mindful to improve our QHSE performance and by increasing our knowledge of the issues and continually monitoring, reviewing and improving our management system controls we will encourage our employees to be aware of and participate in good QHSE practices both at and beyond their places of work.

It is our policy to meet all QHSE standards and all legal requirements, exceeding them wherever possible. We will set and constantly improve our management system with targets and objectives and our results will be analysed in operational and management review meetings.

These policies apply to all those working on behalf of the organisation and will be reviewed annually as a minimum.

| Environmental (ISO 14001:2015)<br>Key Objectives   | Safety (ISO 45001:2018)<br>Key Objectives   | Quality (ISO 9001:2015)<br>Key Objectives  |
|--|---|--|
| <ul style="list-style-type: none"> <li>• Providing value for the environment, the organization itself and interested parties</li> <li>• Identify our environmental aspects and impacts</li> <li>• To monitor the impact on the environment and make sure it is minimised</li> <li>• To involve management and all those working on behalf of the organisation in safeguarding the environment</li> <li>• Integrating our environmental policies into our projects and purchasing activities <b>according to our CSR Policy</b></li> <li>• Defining and reviewing our management plans for continual improvement</li> <li>• To ensure that the threat to pollution is identified, eliminated, tightly controlled, and aimed to prevent going forward.</li> <li>• Respect the community in which we operate and actively support and encourage initiatives for environmental protection</li> <li>• To introduce recycling disciplines</li> <li>• Enhancement of environmental performance</li> <li>• Fulfilment of compliance obligations</li> <li>• Achievement of environmental objectives with a commitment to continual improvement</li> <li>• Improve employee awareness</li> </ul> <p>Authorised by:  11.01.23</p> <p><b>Marco Magnani, Managing Director</b></p> | <ul style="list-style-type: none"> <li>• Identify all existing and potential hazard and risks and implement control measures</li> <li>• To monitor our OHAS and make sure risks are minimised</li> <li>• To consult / involve management and all those working on behalf of the organisation in safeguarding health and safety</li> <li>• Defining and reviewing our management plans for continual improvement</li> <li>• Integrating our health and safety policies into our projects and purchasing activities</li> <li>• Practicing and promoting health and safety</li> <li>• We respect the community in which we operate and actively support and encourage initiatives on health and safety</li> <li>• To provide information, instructions, and supervision for employees in addition to adequate training to ensure all employees are competent to do their tasks.</li> <li>• Remind all employees of their own responsibilities to aid and support the company for good health and safety practices.</li> <li>• secure the health, safety and welfare of employees and other people at work</li> </ul> | <ul style="list-style-type: none"> <li>• To develop and maintain a quality management system which satisfies the requirements of ISO9001:2015 and is based on continuous improvement.</li> <li>• To understand and supply services which meet our customers’ requirements and ensure the service is reliable and consistent.</li> <li>• To establish a strong relationship and seek our customers perception using the results to improve our quality of service.</li> <li>• To provide all those working on behalf of the organisation training and support needed to supply a quality service to our customers. And drive forward the management system and our desire to succeed.</li> <li>• We will monitor our performance by setting meaningful targets and objectives, holding management reviews and external / internal audits using the results to improve our service and better rewards for the business.</li> <li>• To communicate the quality policy and objectives to all employees.</li> <li>• Measuring and acting upon our employee’s views and opinions and use the results to improve our staff’s morale</li> <li>•</li> </ul> |

## Alcohol and Drugs Policy

It is the policy of **SBG GROUP** to strive to maintain a safe, healthy and productive work environment for all of its employees. **SBG GROUP** recognises that the abuse (or inappropriate use) of alcohol, drugs or similar substances by its employees negatively affects their duty to carry out efficient work, and may have serious consequences on their health and on the safety, efficiency and productivity of other **SBG GROUP** employees.

The use, possession, distribution or sale of alcohol, illicit drugs or unprescribed controlled substances on company premises is strictly prohibited and constitutes grounds for subsequent disciplinary action and even dismissal.

Those who consider themselves dependent on any of the aforementioned substances are encouraged to seek medical advice and follow appropriate therapeutic treatment immediately, before their condition negatively affects their ability to work and risks danger to their own wellbeing, to the wellbeing of their work colleagues or third parties, as well as to the safety of company facilities.

- **SBG GROUP** recognises that alcohol and drug dependency is curable.
- The Personnel department is available to employees who need to consult them for any information or for active cooperation in order to recover more effectively. **SBG GROUP** ensures that those who take this decision will be helped, with all the legal and contractual guarantees provided for under current regulations, and in the utmost respect and dignity for the person.
- **SBG GROUP**, exercising its legal obligation to guarantee workplace safety, reserves the right to change the responsibilities of workers within the time limits specified by law, except for what is set out in the following paragraph, in the event that the worker's dependency on alcoholic or narcotic substances is such that, although he is not demonstrating an incapacity to work, it constitutes a danger to the development of his own competencies needed for the service being provided, to his own wellbeing, to the wellbeing of his work colleagues or third parties, or to the safety of company facilities.
- **The incapacity** of the worker to carry out his assigned work duties while under the influence of alcohol or drugs, even following medical treatment, can result in the termination of their employment contract with just cause.
- **During** working activities, consuming alcoholic drinks, drugs, or similar substances is prohibited. It is recommended that employees also avoid consuming these outside of working hours when the effects may last until the next working shift.
- **SBG GROUP** reserves the right to carry out inspections without warning on its own premises to check for possession of drugs or alcohol, and to ask the company management or the relevant authorities to remove from the premises any staff or third parties who find themselves in a **compromised situation** as described above.
- **SBG GROUP** will request its external partners to adopt a similar policy.



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## Environmental Policy

- It is the policy of **SBG GROUP** to carry out its activities in a way that is compatible with the environmental and economic requirements of the community in which it operates. It is also the policy of **SBG GROUP** to respect all laws and regulations in force, and, where laws and regulations do not exist, follow the principle of acting on the company's own sense of responsibility.
- **SBG GROUP** is committed to making a continuous effort to improve its own results in environmental protection while carrying out its activities.
- **SBG GROUP** encourages care and respect for the environment, emphasises the responsibility that each employee has towards environmental performance, and ensures that appropriate business practices and staff training programmes are carried out.
- **SBG GROUP** communicates environmental issues to other interested parties and shares its experiences with others, in order to contribute towards improving environmental performance in the sector.

## Therefore, it is the policy of SBG GROUP to:

- **Collaborate** with government bodies and accredited organisations to encourage the prompt development of efficient environmental laws and regulations, based on valid scientific principles, risk assessments and cost-benefit analysis.
- **Buy** vehicles with a lower fuel consumption and lower polluting emissions, fuels with lower polluting emissions and tyres that guarantee a balance between durability and fuel consumption.
- **Use** authorised suppliers who guarantee the controlled disposal of used materials (batteries, tyres, used oil, fire extinguishers, etc.).
- **Address** incidents that could occur in the course of business in a quick and efficient manner, working with authorities, competent government bodies and qualified organisations.
- **Carry out** appropriate checks with regard to environmental safety, in order to ensure that this policy is complied with.
- **Carry out** appropriate reviews and assessments of the company's operations to measure progress and ensure that this policy is complied with.



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## Health Policy

### It is the policy of SBG GROUP to:

- **Identify** and assess the health risks related to the company's activities which may potentially affect its employees, external partners and the general community.
- **Carry out** programmes and adopt protective measures to control such risks, including adequate monitoring activities for employees who are potentially exposed to them.
- **Distribute** the company's knowledge on health risks or related risks, obtained from occupational health programmes, to people or groups potentially exposed to these risks, as well as to the scientific community.
- **Ensure** the good health of employees through a programme of periodic visits, following the requirements of occupational medicine, or through a programme of voluntary preventative visits.
- **Ensure** or provide the health services necessary for the first aid treatment of work-related illnesses or potential accidents, and for the management of potential health emergencies.
- **Respect** all laws and regulations in force and, where laws and regulations do not exist, follow the company's own experience and sense of responsibility.
- **Collaborate** with government authorities and other institutions to develop laws, regulations and standards based on valid scientific principles and risk assessments.
- **Promote** and support research to increase knowledge of the effects that the company's actions has on health.
- **Carry out** appropriate reviews and assessments of the company's operations to measure progress and ensure that this policy is complied with.

In line with this policy, **SBG GROUP** considers it appropriate to carry out preventive medicine programmes that allow employees to improve their state of health, ability to work, productivity and personal safety. These programmes, which may include periodic medical visits, vaccinations, and reducing risk factors, are appropriately adapted to local situations and will be conducted according to the following principles:

- **The programmes** available to **SBG GROUP** should integrate with, but not interfere with, the responsibility of the employee to have their own medical assistance available.
- **Employee** participation in the company health programmes is voluntary, except for medical visits and examinations required by law intended to ensure the safety of employees and third parties.
- **Any information** obtained from carrying out said programmes will be protected by professional secrecy, except upon specific request from the employee or in circumstances specifically provided for by law.



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## Quality Policy

The **SBG GROUP's** policy is to place the Client's complete satisfaction at the centre of activities, by offering and adjusting every typical process of the service provision, and by focusing on his specific needs, implicit and explicit, as well as monitoring both processes and the achievement of the objectives agreed during the contractual phase.

**SBG GROUP** commits itself to use and review an integrated management system, which is built in order to provide high quality standards and staff's proficiency, and work processes.

**SBG GROUP** commits itself to ensure this Policy is understood, shared, implemented and maintained at each organisational level.

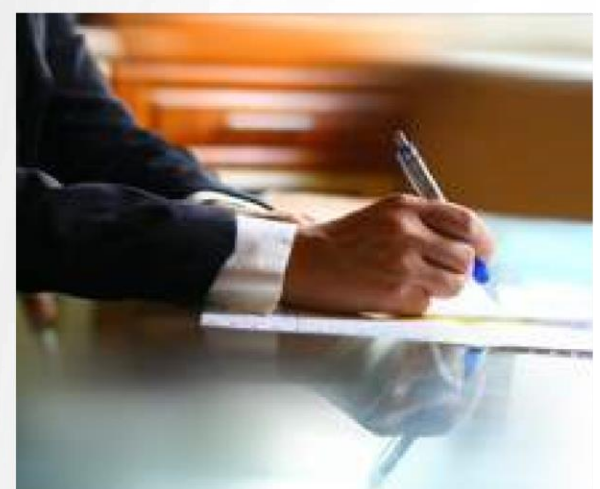
### Therefore the SBG GROUP's policy is:

- **To achieve** the image and market reputation's continuous improvement then **increase** the number of clients, even by expanding the society and by entering new trade areas;
- **To satisfy** the concerned parties (employees, clients, Suppliers);
- **To meet** the contractual commitments, explicit and implicit;
- **To excel** in terms of efficiency, performance, reliability, service and image;
- **To use** the most up-to-date techniques for client support, even through ongoing training activities and updates of company's management and managers;
- **To comply** with the reference law;
- **To disclose** this policy to every organisation level thanks to training meetings and by exposing them inside the rooms, in order to ensure that each concerned party has understood;

### In order to achieve the objectives SBG GROUP commits itself:

- **To increase** staff's formation at each level thanks to specific training programmes;
- **To disclose** to all concerned parties (employees, clients, suppliers) its own ideologies and objectives;
- **To promote** the mentality of continuous improvement;
- **To involve** every concerned party into the process of continuous improvement;
- **To constantly** review its own processes and define measurable targets, in compliance with the strategic objectives defined above.

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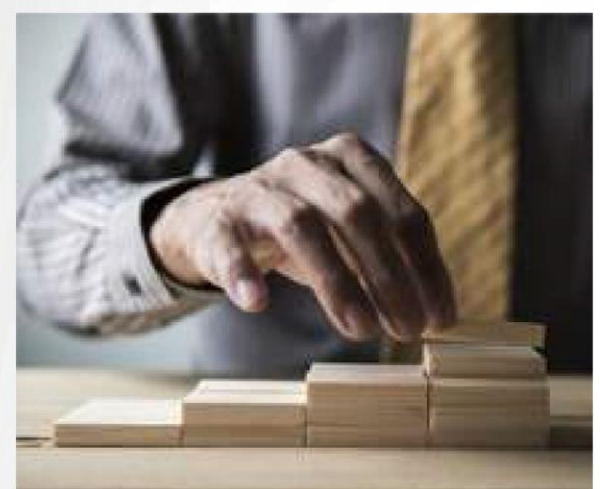
## Policy of sustainable development and environmental hazards

- The **SBG GROUP's** policy is to control the business growth while respecting the sustainable development, expanding its own organisation and activities so that the long-term performances are preserved and extended through a balance of the economic interests with the social and environmental ones.
- The **SBG GROUP's** policy is to reduce the environmental hazards linked to the activities in relation to the environment via the technological improvement of vehicles and infrastructures.
- **SBG GROUP** commits itself to include in its organisation:
  - a development which matches the needs of the current generation, without compromising the ability of the future generation to satisfy its own needs;
  - processes in which the resource exploitation, the direction of investments, the orientation of technological development and the institutional change are all in accordance, and they increase the present and future potentials to satisfy aspirations and human needs;
  - processes and activities performed with the smallest risk towards environment.

### Therefore the SBG GROUP's policy is:

- **To make** every concerned party aware of the environmental protection thanks to a low power of the environmental resources;
- **To constantly** renew the utility yard in order to decrease the emissions' impact linked to the transport activity;
- **To plan** firm purchases in order to make aware choices towards less environmentally damaging solutions;
- **To train** the staff in the field of environment;
- **To establish** intervention procedures in case of environmental emergency which have to be disclosed to all concerned parties;
- **To disclose** this policy to every organisation level thanks to training meetings and by exposing them inside the rooms, in order to ensure that each concerned party has understood;
- **To constantly** review the environmental hazards linked to activities performed with the purpose of decreasing them via programmes of continuous improvement.

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## Safety and Protection Policy

• It is the policy of **SBG GROUP** to guide its own operations and provide its services while working in a way that guarantees the safety of any employees, third parties, customers, the community and properties that could be affected.

It is the policy of **SBG GROUP** to make every effort to prevent any kind of incident, work accident or occupational illness, with the collaboration of all of its employees. **SBG GROUP** constantly strives to identify, eliminate and/or monitor risky situations related to the provision of its services.

### Therefore, it is the policy of SBG GROUP to:

• **Maintain** work equipment and tools at perfect efficiency, adopt business organisation systems, develop staff training and carry out operations in a way that protects people and things.

• **Identify** and manage risks related to the company's services and not carry them out when it is not possible to guarantee an adequate level of safety for the staff, equipment and environment.

• **Outline** specific precautions to adopt during the delivery of a service.

• **Address** in a quick, professional, efficient and diligent manner any kind of emergency or incident which could occur in the course of business, working with qualified organisations and government authorities.

• **Respect** the laws and regulations in force, work with government bodies and qualified associations to develop laws and regulations; where laws or regulations do not exist, follow the company's own experience and sense of responsibility.

• **Develop** internal regulations based on valid scientific principles and on risk assessments, in accordance with the law and suggestions from competent institutions.

• **Encourage** and promote all research that could help increase the knowledge of risks arising from the company's operations and the effects that transported products may have on one's health, making this information available to employees, third parties, government bodies and in general anyone who could be affected.

• **Establish** obligations and responsibilities in terms of safety at work for every employee or external partner involved in our business, promoting safe behaviour even outside of the work environment.

• **Monitor** activities at regular intervals in order to carry out appropriate reviews and assessments to measure the progress reached, and ensure that this policy is complied with.



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