

Integrated company policy

PIOMBOLEGHE's mission is to carry out its industrial activity as best as possible: **recovering from batteries as much metal and all the components that make them, up as possible, protecting people, the environment and the entire ecosystem and reducing energy consumption.**

Respect for the environment, occupational health and safety, rationalization of energy consumption, ethical relations with personnel and the production chain are as important as the quality of the final product and the satisfaction of our customers, and should not be interpreted as regulatory compliance, but as a dutiful behavior for the respect of people's natural rights.

This is why we consider our Integrated Management System to be compliant with the standards

UNI EN ISO 9001: 2015 of **quality**

UNI EN ISO 14001: 2015 of the **environment**

SA 8000: 2014 of **ethics**

ISO 45001: 2018 of **health and safety**

Legislative Decree No. 105/2015 of the **management of major accident risk**

UNI CEI EN ISO 50001: 2018 of **energy**

as the strategic tool of operations to ensure economic growth and development.

PIOMBOLEGHE bases its policy on **competence, preparedness and prevention**, committing itself to **constant compliance with legislative and regulatory requirements and compliance obligations of the organization**, to consolidate the corporate culture of **continuous improvement**, namely the **effectiveness and efficiency** of each activity.

"In the exercise of its economic activity, Piombologhe incorporates what was introduced in Italy in 2016 by **Law 208/2015**, which introduces **Benefit Societies**, and intends to pursue at the same time as profit activity, one or more purposes of common benefit, through a management aimed at balancing with the interest of shareholders and with the interest of those on whom the activities of the Company may have an impact; operates responsibly, sustainably and transparently towards people, communities, territories and the environment, entities and associations and other stakeholders, such as workers, customers, suppliers, lenders, creditors, the Public Administration and civil society. " As a **Benefit Society, Piombologhe** has identified a Manager who is entrusted with functions and tasks aimed at the pursuit of the above purposes. In addition, the company prepares an annual report concerning the pursuit of the common benefit, to be attached to the company's financial statements".

Every commitment, set forth in this policy, is based on the work of the people of Piombologhe. All workers are asked to contribute not only operationally, but also qualitatively and purposefully according to their role in the company.

PIOMBOLEGHE's mission is guaranteed:

- by organizing work as a set of interlinked activities (process approach) with a view to the continuous improvement of their effectiveness by planning them with a risk-based approach and the prevention of negative effects (risk-based thinking) to increase the ability of our organization to achieve the planned objectives, customer satisfaction, compliance with the requirements and the needs and needs of stakeholders;

by the active participation of the management that defines this policy and the consequent objectives and provides the necessary resources for their achievement;

- by the involvement of all employees in the activities of continuous improvement and empowerment on the issues expressed in this policy;

- by collaboration with customers and suppliers and stakeholders in building an active and positive partnership;

Each commitment set forth in this policy is undertaken and measured through the establishment and adherence to the general objectives set forth herein.

Management in establishing these objectives has given due consideration to:

- the traditions, characteristics and peculiarities of the organizational structure;

- the internal and external contexts in at which it operates;

- the needs and expectations of its stakeholders;

- the risks and opportunities associated with its context and processes;

Specific objectives, targets, and business performance are defined, measured and monitored regularly according to the type, size and nature of our activities.

This policy is the main reference for everyone's behavior and is communicated to all employees, contractors, consultants, customers and suppliers. It is also available on the corporate website www.piomboleghe.it for all interested parties.

Piomboleghe has adopted the organizational model according to Legislative Decree 231/2001 as an exemption model for the responsibility of the company's top management with respect to the management of safety (Art. 30 Legislative Decree 231/2001) and the environment (Legislative Decree 121/2011).

Quality policy

Quality means product quality and service correspondence to the requirements set and demanded by customers, satisfaction of stakeholder needs.

- ➔ rigor in making only commitments that Piomboleghe is able to maintain, to ensure full satisfaction of the needs expressed by customers;
- ➔ quality and speed of execution, adherence to delivery times, in compliance with laws, rules and regulations for the safety of people, property and the environment;
- ➔ proper handling of observations, complaints and product and process nonconformities detected internally and by customers;
- ➔ efficiency of machines, equipment and infrastructure with respect to their product and process performance;
- ➔ engaging personnel through information, education and training in order to increase their ability to understand the needs of the Customer and stakeholders;
- ➔ acquiring and/or maintaining the status of a qualified and reliable supplier to its customers;
- ➔ define, comply with and continuously improve the operational and technical practices defined by the IMS by requiring compliance by all direct or indirect workers involved in the organization;
- ➔ continuously improve the performance of the IMS and its activities;
- ➔ ensure the availability of financial, human and technical resources necessary to achieve planned objectives and targets;

Environmental Policy

Environment means reducing the impact of production activities and their management, monitoring and control, as well as meeting the needs of stakeholders

- proper management of issues related to environmental and land protection;
- efficiency of machinery, equipment and infrastructure with respect to their environmental performance;
- proper management of observations, , complaints and environmental nonconformities related to the product and process, detected internally, by customers, suppliers or stakeholders;
- involvement of all workers through information, education and training of personnel on environmental issues;
- taking care of internal and external communication by providing information to stakeholders on its environmental performance;
- acquiring and/or maintaining the status of qualified and environmentally reliable supplier to its customers;
- acquiring and/or maintaining the status of qualified and environmentally reliable supplier to its customers;
- protect the environment by preventing pollution and other specific objectives that the organization commits to consistent with the context in which it operates;
- meeting the organization's compliance obligations to laws, regulations, voluntarily signed requirements, etc.

Ethics Policy

Ethics means the effort toward social sustainability and attention to the expectations of all stakeholders.

It means :

- to be committed to continuous improvement in the relationship with its employees;
- to substantiate with deeds the statements to the workers so that they can appreciate the company at which they work: respect for their rights and safeguarding observations, complaints and nonconformities related to the management of people, detected internally, at suppliers and, if possible, at customers;
- to increase and sustain the company's credibility and reputation with customers, suppliers and its target market;
- to further improve the already good relations with institutions, to further improve the already good relations with institutions compliance or to social security and welfare institutions;
- to increase its incisiveness in ethical behavior in the supplier chain;
- to nurture the main motivation of Piombologhe in initiating initiating each new project, that is, the drive for continuous improvement, which must be personal before organizational and from which one cannot disregard if one wants to do one's job well.

Health and Safety Policy

Health and Safety means prevention and containment of risks to workers and in the workplace

- to comply with laws and regulations, specific requirements, and technical standards on occupational health and safety;
- to adopt the best methods of prevention, surveillance, protection, processes and technologies to reduce risks to workers and promote the prevention of accidents, near misses, injuries and occupational diseases, with a view to continuous improvement;
- to pursue the improvement of the effectiveness of processes and activities management of machines, facilities and workplaces, to improve its performance and control of possible effects on workers in terms of occupational health and safety;
- to take care of communication towards stakeholders, providing, when requested, information on company performance and accommodating their requests and, in the case of workers, ensuring their involvement and consultation regarding health and safety, including through the RLS;

- to involve in an increasingly significant way all its employees and the staff of external firms operating within the Organization, so that they develop a growing awareness of the importance of their role in the proper management of production processes and in the concomitant improvement of environmental and working conditions;
- to ensure the proper training and information of workers on company health and safety risks, in compliance with existing laws.

Energy policy

Energy means the reduction and rationalization of energy use

- ensuring full compliance with all applicable laws and other voluntarily signed energy requirements;
- achieving a reduction in the consumption of raw materials and energy, reducing waste, ensuring the virtuous use of resources, , supporting interventions with a view to Circular Economy;
- guarantee the maximum efficiency of machines, equipment and infrastructure with respect to their energy performance at all times;
- monitoring the consumption of energy resources in order to improve production efficiency and avoid waste;
- looking for innovative technological and managerial solutions aimed at reducing energy consumption, involving plant, machinery and work equipment, supporting and encouraging third-party initiatives from the design stage;
- promoting the purchase of energy efficient and sustainable products and services aimed at improving energy performance;
- pursuing the continuous improvement of energy performance through collaboration and coordination between company resources and the proper use of energy sources, ensuring the reduction of pollution generated by outflows from company processes;
- involving its employees and the staff of external firms working on its behalf, spreading greater awareness of energy use, through appropriate channels of communication, training and information, with particular reference to those areas where energy consumption is significant.

General objectives of the Company Policy

1. comply with laws and regulations, specific requirements, technical standards and system standards, contracts and agreements;
2. recognize the needs of the customer, its workers and stakeholders by directing commitment and resources accordingly;
3. achieve purposes of common benefit by promoting and disseminating to its customers and suppliers the principles of ethical social interest synergistic with its business model;
4. to adopt the best methods of prevention, surveillance and protection, to reduce accidents, forms of pollution and energy consumption, accidents and occupational diseases, , to improve its performance and control control of possible effects on workers population, environment and property of others;
5. to pursue the improvement of the efficiency of processes and activities, ensuring the necessary human, organizational technological and financial resources with relevant information and training, for the clear definition of operating methods, roles and responsibilities;
6. take care of communication to customers, workers, stakeholders and relevant authorities, providing information on its performance and accepting requests and reports;
7. involve and consult workers regarding health and safety in the workplace, including through their safety representative;
8. disseminate and promote company policy by raising awareness of suppliers and contractors and encouraging them toward similar commitments;
9. define and adhere to a code of conduct, based on the ethical principles of respect for others – staff, customers, suppliers, the community – on operational and managerial responsibility;
10. develop and maintain active plans to cope with and manage emergency situations, in cooperation with appropriate internal and external departments, relevant authorities and the local community;
11. to ensure, through the establishment of appropriate improvement programs, that the management of machinery, facilities, equipment, workplaces, is always maintained and conducted with a view to reducing possible impacts on workers, improving environmental protection and energy performance, and with respect to stakeholders;
12. promote cooperation and coordination actions among different company resources and with external enterprises;
13. defend the environment with sustainability programs expressed and measured in its certified Environmental Management System, through a policy of decreasing impact and emissions;
14. support associations that deal with children and adolescents in conditions of hardship in Italy and the World;
15. prohibition of hiring minors, compliance with this requirement is mandatory for the entire chain of stakeholders who collaborate with Piombologhe;
16. improve its image and visibility in the market.

L'Amministratore
Dott. Giuseppe Colombo

