

Travagliato (BS), 16/10/2026

To all Stakeholders

INTEGRATED MANAGEMENT SYSTEM POLICY

Policy on Quality, Environmental Protection, Health and Safety in the Workplace, Social Responsibility and Information Security

IDRA aims to achieve the highest standards of Quality, Environmental Protection, Health and Safety and Social Responsibility, integrating the principles of sustainable development into all its activities. For this reason, it has decided to follow the principles of the following standards in managing its processes:

UNI EN ISO 9001 : 2015
UNI EN ISO 14001 : 2015
UNI ISO 45001: 2018
SA 8000 : 2014
UNI ISO 26000: 2010
UNI Pdr 125 : 2022

IDRA has also decided to comply with the requirements of the VDA ISA 6.0.3 catalogue for the protection of its own information and that of its customers and suppliers with high protection needs. IDRA also adopts the cybersecurity risk management measures required by Directive (EU) 2022/2555 (NIS2), transposed into Italian law by Legislative Decree No. 138 of 4 September 2024.

In addition to strict compliance with national laws, national collective labour agreements, company agreements, the international regulations cited in the standards presented and the sector laws in force, IDRA undertakes in any case to adopt the most restrictive provision.

It considers the following to be absolute, essential and integrated priorities:

- the satisfaction of its Customers;
- the health and safety of its staff, external collaborators and visitors;
- environmental protection,
- Improvement of social conditions and working relationships, and the development of human resources
- Involvement of public administration bodies, suppliers and local communities in its virtuous path.
- the confidentiality, integrity and availability of its own information and that of its Customers and suppliers.
- Compliance with the principles of:
 - Accountability
 - Transparency
 - Ethical behaviour
 - Respect for the interests of interested parties or stakeholders
 - Respect for the principle of legality
 - Respect for international norms of behaviour
 - Respect for human rights

The entire organisation is focused on achieving these objectives through its Management and through every member of the organisation: it is essential to achieve, maintain and enhance ever higher standards of excellence in order to obtain lasting success.

The scope within which the company has decided to operate is that of the international standards of Social Responsibility and Sustainable Development, in particular:

- **Accountability**
IDRA S.r.l. assumes responsibility for its actions towards stakeholders, adopting measures capable of addressing any damage caused and developing preventive actions.
- **Transparency**
IDRA S.r.l. communicates its policies, decisions and activities clearly and accurately, including their actual and potential impacts on society and the environment, through shared tools including the Social Report.

- **Ethical behaviour**
IDRA S.r.l. has defined and maintains its own code of ethics, which must be respected internally and with which its suppliers must also comply, in order to prevent irresponsible or unlawful conduct by those acting in the name and on behalf of the organisation itself.
- **Respect for the interests of interested parties or stakeholders**
IDRA S.r.l. takes into consideration the requests or specific interests of all stakeholders, analysing their characteristics and respective capacity to exert influence, and assessing which approaches may be most suitable for involving each category of party.
- **Respect for the principle of legality**
IDRA S.r.l. complies with all applicable laws and regulations and informs those within the organisation who are required to observe and implement such measures of their obligations.
- **Respect for international norms of behaviour**
IDRA S.r.l. respects international norms of behaviour, also adopting an ethical approach so as not to go along with activities carried out by another organisation (e.g. a supplier company) that are not consistent with international norms of behaviour.
- **Respect for human rights**
IDRA S.r.l., in situations where the law does not ensure respect for human rights, respects international norms of behaviour, taking into consideration all human rights:
 - the right to non-discrimination;
 - gender equality;
 - freedom of association;
 - collective bargaining;
 - child labour;
 - forced and compulsory labour;
 - the rights of indigenous peoples
- **Career Management**
For IDRA S.r.l., career management is the cornerstone of human resource management.
 1. Defining the career management strategy
The organisation has implemented a comprehensive strategy ranging from recruitment to training and employee retention. In this context, it has created a competency framework capable of identifying the company's needs, as well as the jobs and skills that must be acquired or developed to achieve its objectives.
 2. Identification of skills and interests
The organisation has defined the Competency Overview and develops dedicated periodic training policies.
 3. Developing employee skills
Training is naturally integrated into the organisation of work and becomes the norm within the company.
The internal mobility policy enables the company to anticipate professional changes, business developments and recruitment needs, while remaining attentive to the aspirations of its internal resources.
The implementation of a career management plan enables the company to guide employees, support them in their careers and nurture their need for recognition and fulfilment.
- **Innovation, Sustainability and Life Cycle Assessment (LCA)**
Orientation towards the life cycle concept of a product/service, or Life Cycle Thinking (LCT), is an approach promoted by the Integrated Product Policy, an integral part of the EU strategy for sustainable development.
IDRA is committed to combining technological innovation and environmental sustainability, pursuing a development model that integrates the principles of social responsibility, environmental protection and operational efficiency. To achieve these objectives, IDRA:
 - Integrates Life Cycle Assessment (LCA) into every stage of the design and production of its solutions in order to identify and reduce environmental impacts. This assessment enables IDRA to:
 - identify opportunities to reduce the environmental impacts associated with the life cycle of products and services;

- understand which practices to implement in company management in order to establish itself as a sustainable business model;
- support decisions to modify processes, activities and products, making them less impactful and consequently less costly for the company;
- develop environmental communication and targeted marketing strategies;
- identify new guidelines for the development of further products or services;
- evaluate and test the effects of different environmental and resource management policies;
- enhance the best practices implemented by organisations;
- Identify hot spots and define a risk mitigation strategy;
- Promotes the use of recyclable materials and efficient production processes to reduce dependence on virgin resources and reduce waste.
- Ensures that its solutions are designed for a long service life, with ease of maintenance and minimal impact on the overall product life cycle.
- Continuously invests in research and development to improve the efficiency of its processes and to offer solutions that enable customers to optimise their environmental performance.

• **Product End-of-Life Guarantee**

IDRA is committed to constantly optimising the performance of its products in technological, operational and energy terms and, inevitably, in relation to the management of their end of life.

The organisation has adopted the principle of Extended Producer Responsibility (EPR) and, in this respect, promotes sustainable waste management and the search for design solutions that prevent the generation of the related waste at end of life.

In this respect, it is committed to demonstrating the efforts made towards a circular economy model that includes product reuse, buy-back and recycling programmes.

• **Reducing Its Impacts on Environmental Media**

For IDRA S.r.l., reducing environmental impact is not only an ethical imperative: the company is convinced that it also leads to significant economic and reputational benefits.

The organisation is in fact convinced that the transition to a more sustainable company requires constant commitment and significant investment, but that the results for the environment and for the company itself can be extraordinary.

For this reason, IDRA S.r.l., in relation to the impacts of its products and processes on the following environmental media:

Air Water Subsoil Biodiversity Waste Greenhouse Gas Reduction

Works to constantly guarantee and increase:

1. **Energy Efficiency**
Through the adoption of energy-efficient technologies, the optimisation of production processes and raising employee awareness of the importance of energy saving.
2. **Use of Renewable Energy**
Transition to renewable energy sources. This not only contributes to environmental sustainability but can also provide a competitive advantage, demonstrating to stakeholders the commitment to cleaner energy sources.
3. **Waste Reduction and Recycling**
Adopting waste reduction policies and promoting recycling among employees. Recycling company materials can reduce waste disposal costs and contribute to the company's social responsibility.
4. **Sustainable Mobility**
Promoting sustainable mobility has a significant impact on the environment. IDRA S.r.l. encourages the use of public transport, car sharing, company bicycles or electric vehicles, as well as the option of working remotely.
5. **Sustainable Procurement**
Ensuring that the products and services supplied to the company are produced responsibly, using recyclable materials or materials from sustainable sources, is an imperative for the Organisation.
6. **Awareness and Training**
Raising employee awareness of sustainability and providing training on sustainable practices encourage active involvement. Training sessions and workforce engagement generate innovative ideas and greater commitment to reducing environmental impact.
7. **Environmental Monitoring and Reporting**

Monitoring systems to collect data on the company's environmental impact are essential for assessing progress and identifying areas for improvement. The publication of transparent environmental reports demonstrates the company's commitment to sustainability to stakeholders.

8. *Collaboration and Partnerships*

IDRA S.r.l. constantly evaluates collaborations with environmental organisations, academic institutions or other companies to develop innovative solutions and share best practices. Collaboration can expand the resources and expertise available to address environmental challenges.

To achieve its objectives, IDRA applies the following principles:

- The customer must immediately perceive that our strength lies in our ability to be a Global Solution Provider for the products they want to make: correctly and fully understanding the customer's needs, both expressed and unexpressed, is the first key to our success.
- IDRA S.r.l. strives to guarantee the quality of its products/services in terms of price/performance:
 - Preventing all defects.
 - Considering the safety, ergonomics and environmental compatibility of the product as priority characteristics.
 - Continuously improving the quality of its processes, engaging with others to identify new opportunities.
 - Building loyalty in its relationships with its partners and customers;
- IDRA S.r.l. is constantly committed to improving its performance and reducing its environmental impacts:
 - Protecting the environment, reducing the impact of production phases on it and paying the utmost attention to the consumption of natural resources:
 - Paying the utmost attention to pollution prevention, with particular reference to atmospheric emissions
 - Introducing into processes raw and auxiliary materials with better environmental compatibility than those currently in use; assessing in advance the environmental impacts of new processes and of modifications to existing plants
 - Safeguarding surface and underground water resources, preventing accidental spills of hazardous substances
 - Avoiding waste of energy and other resources
 - Managing as effectively as possible the waste produced, promoting recycling and recovery wherever possible
 - Defining specific continuous improvement objectives for the performance of the Environmental Management System:
 - Responsibility for activities is distributed and assigned to the functions holding the organisational and decision-making duties required to perform the specific tasks.
 - the Management System Manager acts as coordinator and collector of information and supervises the correct functioning of the System.
 - Including environmental, social and economic sustainability in the company's investment and growth strategies, which nowadays represents a real competitive advantage.
 - Fostering, over time, a proactive culture aimed at achieving safe behaviour and attitudes on the part of staff with regard to environmental protection;
 - Defining measurable objectives to:
 - Reduce the carbon footprint of its operations and products.
 - Increase energy efficiency throughout the value chain.
 - Optimise internal recycling and sustainable waste management.
 - Monitor and regularly communicate progress in terms of sustainability and innovation.
 - Reducing the environmental pollution generated both by its production activities and by the products it manufactures. It is therefore committed to:
 - Monitor and reduce atmospheric emissions, noise emissions and waste arising from the production plant through the adoption of advanced technologies and low environmental impact processes.
 - Optimise the consumption of energy and natural resources in production processes, favouring renewable sources and energy efficiency systems.
 - Design die casting cells that minimise environmental impact throughout their entire life cycle, promoting energy efficiency, the use of sustainable materials and the reduction of emissions in customers' operations.

- Implement internal recovery and recycling systems to reduce waste generation and maximise the reuse of materials.
 - Collaborate with customers to promote sustainable practices and ensure that the technologies offered contribute to a low environmental impact future.
- IDRA S.r.l. is determined to achieve ever higher standards of occupational health and safety protection, in particular:
 - Conduct its activities in such a way as to safeguard workers, its own and third-party property, the environment and the community.
 - Train and raise awareness among all workers, making them aware of their obligations, responsibilities and the importance of each of their actions in order to create a 'health and safety culture' within the company.
 - Counter incorrect and dangerous working habits, spreading safe behaviour through information, education and training of its staff.
 - Continuously identify the hazards present in the activity and assess in advance the risks of every new activity and/or process in order to adopt solutions capable of preventing injuries and/or occupational diseases.
 - Prevent incidents, injuries and occupational diseases by all means, including through the active participation of employees and internal and external collaborators, in order to improve internal processes and working environments.
 - Strive for continuous improvement of occupational health and safety levels through the continuous updating of technological and management elements.
 - Raise awareness among contractors and suppliers, requiring them to comply with the safety policies, laws and commitments adopted by the company.
 - Ensure the availability and suitability of protective equipment.
 - IDRA S.r.l. is determined to achieve ever higher standards of information security and cybersecurity, in particular:
 - Protect the confidentiality, integrity and availability of its own information and that of its customers and suppliers, classifying it according to a consistent, risk-proportionate scheme.
 - Implement and maintain an Information Security Management System (ISMS) consistent with the company's objectives and stakeholder expectations
 - Adopt a state-of-the-art approach to cybersecurity risk management, in line with the requirements of Directive (EU) 2022/2555 (NIS2) and of the TISAX - VDA ISA 6.0.3 control catalogue.
 - Train and raise awareness among all staff, at every level, on IT risks and correct information-handling practices, in order to spread a culture of IT security within the company.
 - Ensure the timely detection and management of security incidents and their notification to the competent authorities within the time limits laid down by applicable legislation.
 - Require suppliers, sub-suppliers and contractors to comply with adequate levels of IT security, proportionate to the criticality of the information and services involved.
 - Minimise the risk of loss and/or unavailability of the data managed and ensure the operational continuity of business-critical information and network systems, including through periodically tested continuity and recovery plans.
 - Periodically review the adequacy of the security measures adopted, updating them in line with developments in the regulatory and technological context and in the threat landscape, with a view to the continual improvement of the ISMS
- Company Management approves the cybersecurity risk management measures adopted by the Organisation, periodically supervises their implementation and takes part in specific training on IT security, pursuant to Article 23 of Legislative Decree 138/2024.
- IDRA S.r.l. consistently applies the principles of sustainable development in accordance with the Gender Equality specifications, in particular:
 - culture and strategy;
 - governance;
 - human resource management processes;
 - opportunities for the growth and inclusion of women in the company;
 - gender pay equity;
 - parenthood protection and work-life balance.

- IDRA S.r.l. is committed to regularly communicating its progress in terms of sustainability and technological innovation through detailed reports open to stakeholders.

In particular:

- **Company Management:**
 - Constantly analyses and assesses the changing external and internal context to ensure business continuity, carefully assesses the risks and opportunities of every technical, operational and managerial choice.
 - Includes information security and cybersecurity risks among the relevant business risks, ensuring their periodic assessment and, upon significant events or changes, the assignment of an owner and the monitoring of the treatment plans.
 - Sets measurable objectives, consistent with the general objectives of the policy, which make it possible to continuously monitor and improve processes, working methods and service levels.
 - Is committed to:
 - Not use child labour;
 - Not use forced labour, and not require staff to leave deposits or identity documents at the start of the employment relationship;
 - Guarantee workers' right to trade union association and to company-level bargaining.
 - Ensure adequate means of communication within the company for trade union representatives and that they are not subject to any discrimination;
 - Not engage, during the establishment, performance and termination of the employment relationship, in any discrimination relating to any social and/or personal condition of the worker.
 - Not tolerate, and suppress, behaviour that is offensive to workers;
 - constantly improve staff motivation and awareness of ethical, health and safety, environmental protection and production process optimisation issues.
 - Involves trade union representatives.
 - Guarantees:
 - the right of staff to a decent wage, and that wages for a normal working week, excluding overtime, always meet at least the legal or industry minimum standards, or collective agreements (where applicable).
 - that the composition of staff wages and benefits is detailed clearly and regularly in writing for each pay period. The organisation must lawfully pay all wages and benefits due in a manner convenient to workers, but in no case in delayed or restricted forms.
 - that all overtime is compensated at a premium rate defined by national legislation or established by a collective labour agreement.
 - not to use labour-only contracting arrangements, consecutive short-term contracts and/or false apprenticeships or other schemes to avoid fulfilling its obligations to staff under applicable labour and social security laws and regulations.
 - Compliance with applicable laws, collective labour agreements and industry standards on working hours, breaks and public holidays.
 - That all overtime is voluntary, unless it is necessary to meet short-term business demand and consistent with the negotiated collective agreement.
 - Improves relations with institutions through involvement in and implementation of initiatives for local communities.
 - Measures compliance with, and improves the effectiveness of, the quality system through Internal Audits.
 - Rewards virtuous and proactive behaviour in line with the Organisation's principles.
 - Pursues continuous improvement through the optimisation of the company organisation, staff training and constant verification of system management.
 - Prepares its Social Report annually in accordance with the following principles:
 - **Transparency:** makes clear the logical process followed to collect and classify information;
 - **Neutrality:** presents information impartially, completely and independently of partisan interests, regarding both the positive and negative aspects of management, and without distortions aimed at satisfying the interests of the directors or of a category of stakeholders;
 - **Period relevance:** the social activities and results reported are exclusively those carried out / occurring in the reference year;
 - **Comparability:** the presentation enables comparison both over time and in space (as far as possible);
 - **Clarity:** presents information clearly and understandably;

- *Truthfulness and verifiability*: the data reported refer to the information sources used;
 - *Reliability*: the positive and negative data reported are provided objectively and are neither overestimated nor underestimated;
 - *Autonomy of third parties*: where third parties are engaged to deal with specific aspects of the social report, or to guarantee the quality of the process or to formulate assessments or comments, the fullest autonomy and independence of judgement is required of them and guaranteed to them.
- *Every person in the company* is committed every day, within their own competences, to improving the quality of the processes, in order to achieve:
 - Greater effectiveness and efficiency, resulting in increasing profitability,
 - Compliance with delivery times and intermediate milestones,
 - Maintaining a high-end customer and stakeholder base that is challenging and able to make the Organisation grow.
 - Improving the working environment in which we operate every day, the standards of occupational safety, preventing injuries and occupational diseases.
 - Analysing our activities, actively striving to prevent pollution and minimise the environmental impact of our activities, using natural resources and energy more efficiently.

The impact of this '*modus operandi*' requires the utmost support from Company Management, but also the involvement and active collaboration of all staff, in order to continue the growth and development of the company. IDRA also undertakes:

- to distribute internally the policy documents, the results of management system audits and the management review.
- to publish the policy on the website and send it to interested stakeholders.
- to make available to stakeholders the documents relating to the Integrated Management System, in order to ensure the mutual enhancement of performance in terms of competitiveness, achievement of ever higher standards of quality, respect for the environment, health and safety protection and social responsibility.

This Policy Document will be periodically reviewed and updated to ensure its relevance with respect to regulatory, technological and market changes.

Management assumes responsibility for implementing this policy and for ensuring that all employees, partners and interested parties understand and share our commitments.

Company Management

