

## **Integrated Environment, Safety, Social Ethics and Anti-Corruption Policy**

**Rev.04 – January 2023**

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Metra S.p.A. is a company of Metra Group, based in Rodengo Saiano (BS), Italy.

At its factories in via Stacca 1, which occupy an area of over 100,000 square meters (half of which is covered) with a staff of about 400 employees, it designs and produces extruded aluminium alloy profiles for building and industrial use.

### **COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS**

The Metra Spa Management is completely aware that today a successful economic strategy cannot ignore the environmental responsibilities resulting from its activities.

This is why a management system for environmental protection is implemented, inspired by the international reference standard ISO14001: 2015. Metra has set the following goals:

- ✓ Engaging adequate resources to meet its compliance obligations, defined by legal provisions in force and by any additional requirements accepted on a voluntary basis;
- ✓ Implementing economically sustainable efforts in organizational, operational and technological terms to protect the environment and prevent the pollution;
- ✓ Optimizing the use of raw materials, also fostering recovery and recycling activities;
- ✓ Minimizing energy consumption and reduce emissions into the atmosphere that are harmful to the environment;
- ✓ Managing the identification, storage, and disposal of waste;
- ✓ Privileging relationships with suppliers and contractors of any external processes that share the same commitments to environmental protection;
- ✓ Continuously improving the management system and its ability to achieve higher environmental performance.
- ✓ Periodical analysis of LCA and the GHG emissions of our productions and definition of continuous reduction goals for GHG emissions;
- ✓ Groundwater and surface water quality preservation, adoption of any technical solution to reduce water consumption.

### **COMPLIANCE WITH HEALTH AND SAFETY REQUIREMENTS AT WORK**

The Metra Spa Management recognizes the need for a constant commitment to safety in order to protect the physical and psycho-logical integrity of workers, and therefore intends to implement and maintain an organization able to better manage the problems in order to achieve the following objectives for safety:

- ✓ To reduce to "zero" the incident risks associated with the company's activities, for workers and for all the people who may have the access in the company (visitors, customers, contractors, etc.) in a continuous improvement process according to D.Lgs 81/2008 and subsequent modifications and additions;
- ✓ To implement the technically possible actions to create a work environment that avoids the onset of occupational diseases and emergency situations, in collaboration with the Occupational Health Physician, Workers' Safety Representatives and H&S. In particular: machines must be safety compliant to the reference standards, workplace must

#### **METRA S.p.A.**

Società soggetta all'attività di direzione e coordinamento di Fengari Holdings Cooperatief U.A.

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- be ergonomic for the personnel, hazardous substances must be replaced with less dangerous ones and their proper handling and usage must be guaranteed, all fire prevention safeguards must be embraced and periodically verified;
- ✓ To involve and raise awareness of all company subjects, at all levels, in the management of problems relating to safety at work;
  - ✓ To ensure the understanding, the application and the maintenance at all levels of the correct operating procedures, the safety regulations in force and the provisions of the Management;
  - ✓ To ensure that workers, at any level, receive adequate information, education and training and have the necessary competence to carry out the tasks entrusted to them in the safest possible way. The personnel must be aware of and trained in the emergency preparedness plan;
  - ✓ To ensure the availability, suitability and regular use of PPE (Personal Protective Equipment) for the personnel;
  - ✓ To carry out the periodic review of the integrated policy and its effectiveness;

The Management is committed to ensure that these objectives are shared and pursued by all staff who works or are called to work in the company or for the company.

## THE RESPECT OF THE ETHICAL REQUIREMENTS

Metra S.p.A., in addition to environmental and safety requirements, decided to introduce a system of ethical requirements, based on the Universal Declaration of Human Rights, on ILO documents and other international standards, and on the national laws regarding human and labor rights, with the purpose of protecting all the people within the organization's sphere of control.

Metra S.p.A. decided to embrace and respect some concepts of social ethics including;

- ✓ Not-use of child labor;
- ✓ Not-use of forced labor;
- ✓ Compliance with the mandatory requirements regarding health and safety at work;
- ✓ Freedom of association, right to collective bargaining;
- ✓ Respect for the personal freedom of each individual worker (e.g.: minorities and indigenous peoples rights);
- ✓ Respect for the gender equality and women's rights;
- ✓ Proper management of wages and working hours.

On this regard, the Management works continuously to:

- ✓ Establish a climate of mutual harmony from an organizational point of view;
- ✓ Maintain optimal relationships between staff and company and encourage a participatory model and dialogue with staff, carry out company social climate analysis;
- ✓ Apply equal opportunities principles to all staff levels (recruitment, training, development, promotion, etc.);
- ✓ Avoid forms of discrimination and marginalization and promote equal opportunities for all personnel;
- ✓ Activate a gradual involvement of suppliers in the ethical path that has been started, in order to consider them as partners on issues of social responsibility;

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### **COMPLIANCE WITH ANTI-CORRUPTION REQUIREMENTS AND 231**

Metra S.p.A. is firmly convinced that its commitment to the prevention of Corruption can influence its contractual relations, thus ensuring a progressive spread of ethical principles and values to an ever wider sphere of stakeholders.

Metra S.p.A. formally undertakes the commitment to:

- ✓ Forbid all forms of corruption by adopting a zero-tolerance approach;
- ✓ Observe national laws, other laws and requirements in force on anti-corruption and Decree D.Lgs 231/2001;
- ✓ Supervise the application of the internal Code of Conduct regarding regulation of business conduct;
- ✓ Make this Policy public and accessible to all company levels by posting it on the notice board, on the website and providing suitable training;
- ✓ Encourage the reporting of suspects in good faith, or on the basis of a reasonable and confidential belief, without fear of recrimination;
- ✓ Adapt this Policy to the regulatory changes in the sector and the needs arising from the requirements defined in the Anti-Corruption management system with a view to continuous improvement.


In order to give substance and be able to measure the level of implementation of the commitments set out in this Policy, the Management establishes environmental, safety, ethical objectives and targets related to Decree D.Lgs 231/2001 to be integrated with the operational management of the plant and corporate development programs.

*The contents of the Integrated Policy are communicated and shared internally with people operating under the control of Metra S.p.A., so that everyone according to their own operations, contributes to implement these fundamental principles in the interest of the entire community.*

*The document is available to all interested parts through the publication on the company website and the System Manager is authorized to provide a copy to anyone who requests it.*

*The Management reserves the right to periodically evaluate and possibly update this Policy to ensure its adequacy and topicality and the integration of this Policy into the company business processes.*

Rodengo Saiano, January 16<sup>th</sup> 2023



Direzione Metra Spa  
Ing. Enrico Zampedri

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