

TITOLO / TITLE:	POLITICA PER LA GESTIONE AZIENDALE COMPANY MANAGEMENT POLICY
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REVISION STATE AND HISTORY				
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02	20/10/2023	Monari L.	P. Iengo	Few clarifications regarding health, safety and environment.
01	31/12/2022	ComEx	P. Iengo	Minor formal changes and clarifications.
00	31/08/2022	ComEx	P. Iengo	Replaces previous doc. named "Quality Policy" (QLT-M-000), expanding its context to the various company policy themes.

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1 INTRODUCTION

The present document outlines the company management policy of Ballestra S.p.A. (from now on, “Ballestra” or “the Company”), with the aim of communicating to the public:

- its basic settings and principles;
- its permanent objectives;
- the commitments it assumes in relation to all parties involved.

The present Policy sums up and harmonises the following company “policies”:

- a. Policy for Quality;
- b. Policy for Legality and Compliance;
- c. Policy for Health e Safety;
- d. Policy for Social and Environmental Sustainability.

This is also complementary to the company’s Ethical Code, which expresses more specifically and precisely the values and the principles inspiring it.

Ballestra aims to create value within the market sectors where it operates, whether as a global leader or an emerging player. This is achieved thanks to its levels of effectiveness and efficiency that are constantly increasing, the optimisation of its management production processes, adherence to the needs of the market and of the context where it operates, satisfaction and loyalty incentivisation of its clients and its continuous technological and operational development and enhancement.

Coherently with said objective, the Company has been striving for years to pay increasingly more attention towards sustainability at all levels. On one hand the aim is to maximise financial profit, ensuring the acquisition and the execution of projects with suitable profitability and financial stability, in compliance with the objectives fixed by the shareholders, the legitimate interests of our clients, our employees and our suppliers. We do however also seek the satisfaction of all parties involved, directly or indirectly, in the chain of value creation, protecting and enhancing the reputation of the Company towards all its stakeholders, with the aim of making the success of the Company last longer while fostering its sustainable growth.

In particular the Company, in compliance and in conformity with its own specific market objectives, recognises the need to commit at all levels for the constant improvement of the aspects described in the following paragraphs.

2 BUSINESS, MARKET LEADERSHIP AND CUSTOMER ORIENTATION

The Company aims to consolidate and strengthen its leading or growing positions in the sectors in which it operates, maintaining and enhancing its own commercial, technological, operative and financial reputation, increasing the satisfaction of clients and partners and constantly seeking to offer products and services that are increasingly safer, more reliable and more competitive while keeping efficiency at the core of its operativity, with the objective of saving time and operative costs, errors, waste and reworkings.

To maintain a result-driven attitude, fulfilling our contractual obligations towards our clients, preserving their trust and reputation, that Ballestra can boast on the market, those are the core values for the consistency of our business, as well as permanent objectives for everyone.

It is also to this end that the Company pays close attention and invests great resources in Research and Development (R&D), turning it into a strategic service, involved not just in researching proprietary technologies and in the commercial and executive development of the licensed technologies, but also “at the forefront” in customer service.

Among the permanent objectives of Ballestra’s Research and Development, along with the technological improvement, the expanding and the optimisation of the products portfolio and the reduction of production and maintenance costs, we can find:

- reduction of the environmental impact of its machines and its plants;
- improvement of said machines and plants in terms of safety and prevention;
- improvement of the final product – destined to consumers markets – in terms of impact both on the health of consumers and on the environment.

3 HEALTH, SAFETY, PREVENTION

Ballestra actively pursues the objective of reducing injuries to ZERO, both in the context of work activities managed directly and of assembling, erecting, commissioning, testing and operating its plants and its machinery.

The Company believes that it is essential to provide to all its employees and co-operators a safe working environment and safe working conditions, regardless of whether the working activity is carried out in-house, away, or in flexi-working. It also believes that it is useful and only appropriate to commit to protecting the health, safety and wellbeing of individuals, but also so that every individual involved in the activities can grow professionally and express their potential to the best of their abilities, in a highly collaborative and lively environment, in compliance with the rights, the responsibilities and the duties of each party involved.

Equally, Ballestra is committed to ensuring complete safety and conformity of all its products and correlated processes.

To this end, along with the accurate and timely compliance with the local and Italian norms, the Company implements a Health & Safety Management System, compatible and compliant with the International Standard ISO-45001.

Within this context, the Company promotes and implements actions to ensure a proper consultation of all workers, as well as an improvement of their degree of participation. Particularly, workers are strongly encouraged to report any case of “near miss” that may occur in the working context.

4 ENVIRONMENTAL SUSTAINABILITY

The Company is committed to pursuing higher and higher environmental sustainability, by preventing pollution at all levels and by optimizing waste management, with the final aim to protect the environment and any involved counterpart.

This commitment finds its application both in the organisation and optimisation of the company's direct activities, both in the reduction of the environmental impact of plants and machinery planned and sold, involving to this end the entire production chain, internal and external.

For this purpose, the Company is directly involved in a program of progressive and systematic reduction of its overall carbon footprint, as well as that of its partners and products, and it implements an Environmental Management System, compliant with the requisites of the International Standard ISO-14001.

5 HUMAN RIGHT – LEGALITY – ETHICAL BEHAVIOUR

The Company, having always operated in a global context, believes in legality and rigorous respect of human rights and it remains vigilant with regard to any type of threat to the latter. In particular, procedures are implemented, and monitoring is carried out, with the aim of preventing cons, frauds, corrupted behaviour, illegal commercial practices, unfair working practices, violations of intellectual properties and any other action which may constitute a crime or may simply taint its ethical vocation.

This type of attention is placed both inside the Company itself and towards all third parties with whom transactions, collaborations and/or commercial practices are currently ongoing.

The Company therefore strives to satisfy all its conformity obligations, whether they are cogent, contractual, expressed or even just implicit.

Throughout all phases of the planning and productive cycle the following aspects must be closely monitored: ensuring compliance to all applicable national and international laws and norms and satisfying their requisites, both implicit and expressed in the contracts, ensuring satisfaction of the Client, the safety and health of all users of the plants produced and of the collaborators involved in said production.

In this context, the Company already adopted a few years ago a Management Model for the prevention of crimes as per D.L. 231 and it has integrated its own operative procedures in accordance with the guidelines of the International Standard ISO-26000. This includes activities aimed to verify the behaviour of its counterparties, to ensure a full compliance to international sanctions and other applicable regulations.

6 VALORISATION OF THE HUMAN CAPITAL

The success of the Company is based on the value and the commitment of its co-operators.

Ballestra intends to promote professional growth, satisfaction and motivation of its own co-operators, so that they can contribute in fulfilling the company's objectives, each from their own end, with loyalty, responsibility, initiative and in autonomy, within the scope and limits of the mandates received.

Ballestra also encourages the sharing of operative experiences at all levels, as an indispensable tool for improvement and company cohesion.

Management is constantly involved in ensuring maximum circulation and sharing of the agreed objectives, (both financial and operative), as agreed with the Property, so that all its collaborators can operate in harmony to achieve them.

7 INTEGRATED QUALITY AND MANAGEMENT OF SYSTEMS

The Company, certified ISO-9001 since 2001, understands Quality Management as an integrated system oriented towards “Total Quality”. To this end, the Management System for Quality is implemented and improved not only with the aim of pursuing the usual objectives of continuous improvement, attention to clients, cooperation with suppliers and with all interested parties, but also to serve as model and basis for the harmonic development of all other management systems.

A specific internal Committee is in charge of continuously working on coordinating and harmonising work procedures, in compliance with the peculiarities of the various systems adopted and under adoption.

The different aspects of company management, as summarily described in the present document, supply an equal number of indications and measurements that help feeding the mechanism of “continuous improvement” and of “lessons learnt”, in order to capitalise the executive know-how while improving the value of the Company. Furthermore, a coherent approach to methodologies of risk analysis and of opportunities acts as methodological basis for the various applications.

8 ICT ASSETS AND SECURITY

The Company has carried out, in recent years, a very high effort to modernise its equipment in the field of Information & Communication Technology, to the point that it has become the competence centre and the “focal point” for the entire DB Group in managing the systems and supplying the services (until the carve-out of its “Food, Feed & Biofuel” Division).

Said effort continues, with the aim of maintaining constantly updated hardware and software equipment, competences and standards of safety and data-protection and the company know-how.

9 COMMUNICATION AND AWARENESS

The Company believes that efficient and effective internal and external communication are essential tools to achieve durable success and the satisfaction of all parties involved.

The constant improvement of communication has to be a common and permanent objective of every company element, both in terms of fine-tuning and improving operative instruments, from an organisational, procedural and formative point of view.

10 CONCLUSION

All policies expressed in the present document are implemented via objectives, which are formulated and managed, year by year, based on the results of the Management Review.

What has been hereby outlined finds completion and further clarification in the following documents:

- Ethical Code and Sustainability Principles (ESG-003)
- Analysis of the Company Context (ESG-002)

The entire personnel (employees and co-operators) of the Company is informed of the decisions made and of the objectives identified and they must follow all prescriptions and respect, without any exception,

the procedures outlined by the Management Systems, maintaining constant reference to the principles expressed in the current declaration and in the other documents mentioned.

The contents of this document is conveniently shared with all stakeholders.

