



COMPANY POLICY

MISSION

For four generations, BERTOT S.p.A. has been a trusted partner to leading companies across a wide range of industries, manufacturing components in innovative metal alloys for trains, railway networks, cableway systems, oil & gas, large engines and many other applications.

Through a careful analysis of each customer's specific needs, we develop tailored solutions and oversee every stage of the production cycle, from design through to final manufacturing, transforming raw materials into hundreds of unique components. Every project represents a new challenge, which we address with passion and determination, supported by continuous investment in research, technical expertise and advanced technologies.

VISION

Our ambition is to become a benchmark for quality and reliability in the production of safety-critical components. This commitment drives us to evolve continuously, investing in innovation to improve our processes and services. We believe that a dynamic team is the key to our success. Every day, we work together to grow, strengthen our expertise and take on new challenges.

The Company's Mission and Vision are reflected in the following commitments:

QUALITY

BERTOT S.p.A., reaffirming its belief that quality is essential to successfully competing in the market, is committed to:

1. achieving a high level of customer satisfaction, measured objectively through appropriate indicators;
2. complying with the delivery dates agreed with customers;
3. analysing the needs and expectations of interested parties by assessing the context in which the Company operates;
4. promoting continuous improvement;
5. paying the utmost attention to preventing potential product failures during operation;
6. promoting a process-based approach founded on the analysis of internal and external risks;
7. defining KPIs and PIs for each company process.



ENVIRONMENT

BERTOT S.p.A. firmly believes that the environment is a valuable asset that must be protected, and that mere compliance with environmental legislation cannot be considered sufficient for sustainable development.

For this reason, BERTOT S.p.A. is committed to:

1. pursuing the continuous improvement of environmental performance by adopting the technologies and measures required to prevent and reduce all forms of pollution;
2. promoting waste management based on the principles of reduction, recycling and reuse;
3. reducing dependence on external energy supplies and relying, wherever possible, on self-generation;
4. raising awareness and promoting responsibility among all internal personnel, as well as the most critical suppliers and collaborators, on the protection, respect and preservation of the environment;
5. monitoring and reducing energy consumption and greenhouse gas emissions, while promoting the use of renewable sources and energy efficiency solutions;
6. managing natural resources responsibly, with particular attention to water consumption and quality, encouraging water reuse and conservation;
7. limiting atmospheric pollution through emission control and the adoption of production processes with a lower environmental impact;
8. ensuring the safe and responsible management of materials, chemical products and waste, minimising their negative impact on the environment and public health;
9. protecting biodiversity and ecosystems, reducing as far as possible the impact of its activities on natural habitats and protected species;
10. safeguarding customer health and safety through the provision of sustainable products and services that comply with the highest environmental and safety standards;
11. promoting sustainability throughout the value chain, working with suppliers, customers and stakeholders to disseminate good practices in environmental protection and social responsibility.



HEALTH, SAFETY AND SOCIAL RESPONSIBILITY

BERTOT S.p.A. recognises that pursuing the best possible health and safety conditions, while promoting responsible social practices, is a fundamental element of civil and ethical business conduct. The Company has therefore decided to expressly undertake the following commitments, actively promoting and supporting the principles set out in its Code of Ethics, which form a foundation of our corporate culture and day-to-day practices:

1. preventing accidents and occupational diseases through:
 - the continuous improvement of infrastructure and work equipment;
 - the proactive involvement of workers;
2. ensuring compliance with applicable health and safety legislation in the workplace;
3. giving due importance to matters relating to product safety and to the people involved in the development of an idea, product or service.
4. Management is firmly opposed to any form of:
 - child labour;
 - illegal, forced or compulsory labour;
 - work that does not provide adequate rest periods;
 - discrimination in employment and remuneration based on religious belief, nationality, ethnicity, opinions, gender, physical condition, age and/or social status.
5. strictly complying with all laws, regulations and other subscribed requirements relating to employment matters;
6. raising awareness among its suppliers of the need to comply with the principles set out above, as well as with laws and regulations on workplace health and safety and labour rights, requiring compliance with the Supplier Code of Conduct;
7. guaranteeing freedom of association.



GOVERNANCE

- The Management of BERTOT S.p.A. firmly believes that the organisation must operate in full compliance with applicable laws and with the fundamental principles of clarity, transparency, integrity and honesty.

For this reason, BERTOT S.p.A. **has adopted an Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001**, as a tool for preventing offences and strengthening a corporate culture based on legality and transparency. The 231 Model defines principles, protocols and organisational measures aimed at preventing unlawful conduct carried out in the interest or to the advantage of the Company.

Within this framework, BERTOT S.p.A. has undertaken the following commitments:

- **It has adopted a Code of Ethics**, which applies to all company activities and serves as a fundamental reference for all interested parties. The Code of Ethics defines the conduct to be adopted and the guidelines to ensure that operations are carried out with the utmost integrity and in compliance with ethical principles.
- **It is committed to disseminating the Code of Ethics and ensuring compliance with its provisions**, so that all employees and collaborators are aware of and adopt these principles, thereby contributing to their implementation and to the continuous improvement of the working environment.
- **It has adopted a Code of Conduct** for employees, establishing ethical rules and behaviours for all members of the organisation, so that every action undertaken reflects the values of responsibility, fairness and respect for others.
- **It ensures that any unlawful conduct may be reported** through the channel provided for in the Code of Ethics, guaranteeing protection, confidentiality and the absence of retaliation against the reporting person.
- **It has established a Supervisory Body**, the Organismo di Vigilanza, or OdV, with autonomous powers of initiative and control, responsible for monitoring the effective implementation and updating of the 231 Model and the Code of Ethics, as well as for receiving and managing reports concerning any violations.
- BERTOT S.p.A. condemns all forms of **corruption, extortion, fraud** and money laundering, and is committed to operating with the highest standards of transparency, honesty and compliance with applicable regulations.

The commitments set out in this Company Policy are implemented through an **integrated management system**. Objectives that are quantified, measurable and consistent with the commitments described above are defined, communicated and reviewed annually during the Management Review, or whenever significant deviations occur, particularly with regard to critical indicators that have a direct impact on the Company's business performance, namely KPIs.



ENERGY

BERTOT S.p.A. recognises that energy is a strategic factor for the environmental, economic and production sustainability of the organisation. The Company is therefore committed to promoting the efficient and responsible management of energy resources, in accordance with the principles of ISO 50001. Management recognises its central role in the continuous improvement of energy performance and ensures the necessary support for achieving the defined objectives, through the availability of appropriate information, resources, expertise and technologies.

To this end, BERTOT S.p.A. is committed to:

- developing, maintaining and continuously improving an Energy Management System integrated into company processes;
- ensuring compliance with legislative requirements and other applicable requirements relating to energy use, consumption and efficiency;
- continuously improving energy performance, energy efficiency and the responsible use of energy;
- defining energy objectives and targets consistent with the company context, periodically monitoring their achievement through specific indicators;
- supporting the purchase of energy-efficient products, services, plants and technologies that have a significant impact on energy performance;
- supporting design and development activities that take into account the improvement of energy performance throughout the entire life cycle of production processes and plants;
- promoting the use of renewable energy sources and innovative solutions aimed at reducing energy consumption and associated emissions;
- ensuring the availability of the data and information required to analyse and monitor significant energy uses;
- raising awareness, training and involving personnel so that they actively contribute to the achievement of the Company's energy objectives;
- promoting a culture of energy efficiency and sustainability among suppliers, contractors and partners.

Management ensures that this Energy Policy is communicated, understood, applied and made available to all interested parties, as a reference for the continuous improvement of the organisation's energy performance.

Ciriè, 03/28/2026

Bertot S.p.A.