



COMPANY POLICY

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COMPANY POLICY STATEMENT OF BTP INFRASTRUTTURA

BTP INFRASTRUTTURA S.P.A. bases its COMPANY POLICY on the commitment to operate in compliance with general principles and binding technical standards regarding environmental protection, quality, workers' health, safety and well-being, and social responsibility.

To this end, the Management of BTP INFRASTRUTTURA S.P.A., through this Company Policy Statement, is committed to achieving the company's objectives by providing the necessary resources, both in terms of qualified human resources and financial means..

By choosing to implement an Integrated Management System, the Management of BTP INFRASTRUTTURA S.P.A. has committed itself directly to managing the quality of the services offered, environmental protection, safety, the health and well-being of its personnel, and corporate ethics.

The Management of BTP INFRASTRUTTURA S.P.A. has adopted the concept of 'risk-based thinking' in line with the requirements of ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018. BTP INFRASTRUTTURA has analyzed the external and internal context in which it operates, both in Italy and abroad, assessing risks and defining the internal and external impacts (particularly with respect to stakeholders), as well as the actions and responsibilities necessary to monitor and control them, or to minimize them to an acceptable level.

BTP INFRASTRUTTURA has also implemented the management of all changes occurring in its activities, including those related to context (e.g., new market or new project) and stakeholders, which may alter their significance and effects. All of this is incorporated within a system of continuous improvement.

The Integrated Management System has been designed and implemented by Top Management with the aim of:

- Establishing an Integrated Management System with regard to the recognition and achievement of the requirements set out in the reference standards (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, SA 8000);
- Defining the process through which BTP INFRASTRUTTURA delivers its services, monitors them, and constantly controls its ability to meet customer needs while achieving its corporate objectives;
- ensuring that the Integrated Management System is continuously monitored in order to measure its effectiveness in guaranteeing the achievement of corporate objectives and compliance with the reference standards, while promptly identifying any relevant changes;
- ensuring that company personnel, consultants, and suppliers act in conformity with the principles of the three reference standards;
- ensuring the availability of adequate human resources (skills and qualifications) and technical resources (equipment, technologies, financial support);
- involving all personnel in the company's primary objectives, as it seeks to operate in compliance with the needs and requirements of its Clients, without neglecting the protection of health and safety at work and the social well-being of all staff contributing to the provision of engineering services, thereby creating an environment that fosters employee engagement and growth;
- pursuing the continuous improvement of service levels to ensure ongoing and increasing Client satisfaction, in order to maintain a strong market presence by developing customer loyalty and, where possible and in line with available resources, acquiring new market share;
- establishing methods to measure the Company's performance, to verify the achievement of planned objectives. These methods include:
 - Economic and financial measurements;
 - Measurements of company process performance;
 - Assessments regarding the level of Client satisfaction with the services provided and the quality as perceived by Clients;
 - External measurements concerning the performance of direct competitors and evaluations of reports issued by the Certification Body;
 - Promotion of the necessary actions to prevent nonconformities in the services provided to Clients and within the Company's Integrated System;
 - Verification of the implementation of the adopted solutions;
 - Adoption of immediate measures through corrective and preventive actions in the event of deviations from corporate objectives based on Client complaints;



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- Identification of critical issues in company processes that contribute to the provision of services to Clients, in order to implement actions to monitor them and, if necessary, resolve them;
- Identification, for each service offered, of suitable process indicators that can be used to evaluate the quality of the service itself (compliance with deadlines, number of revisions), and the establishment of measurable objectives, as well as the verification and assessment of all risks associated with such services;
- definition of objectives for the continuous improvement of the services provided, in compliance with laws, with the intent to ensure the development of resources, the professional growth of personnel, and the protection of safety through the reduction of accident risks.

These principles apply to all areas of activity of BTP INFRASTRUTTURE S.p.A., namely:

- **Design, Works Supervision, Construction Supervision, and Project Management Consultancy (PMC) for Transport Infrastructure and Complex Building projects.**
- **Engineering, Procurement, Construction (EPC), Operation & Maintenance (O&M), and Project Management Consultancy (PMC) for plants in the industrial and civil sectors, renewable energy, and petrochemical industries.**

BTP INFRASTRUTTURE S.p.A. considers:

- its EMPLOYEES as its main strategic resource and ensures respect for their rights as well as their safety, implementing every possible action aimed at preventing accidents, considering professional training and prevention as the most effective tools for reducing risks;
- its SUPPLIERS/CONSULTANTS as partners to whom it transfers the obligations set out by standards, particularly with regard to environmental protection and the safety, health, and well-being of employees;
- its CLIENTS as a crucial element of its success and does everything in its power to ensure their satisfaction and earn their trust.

The Management of BTP INFRASTRUTTURE S.P.A. is directly committed to:

- Conducting all service management activities within its operational sector in full compliance with applicable laws and regulations aimed at environmental protection and the management of quality, health, safety, and worker well-being;
- Constantly analyzing the impact of its activities on the environment and safety to ensure every possible effort is made to define preventive and continuous improvement actions, also through the use of technologies that reduce risks and environmental and economic impacts;
- Providing safe and healthy working conditions to prevent accidents and health issues, appropriate to the purpose, size, and context of the organization and to the specific nature of its occupational health and safety risks and opportunities;
- Emphasizing consultation and participation of workers and their representatives in objectives regarding occupational health and safety;
- developing and preserving corporate know-how through educational and training activities for personnel, to ensure professional growth, maintain a high level of Client satisfaction, and promote awareness of the importance of technical requirements aimed at protecting the environment, worker and third-party safety, and in particular the safety of end-users of the services provided by BTP INFRASTRUTTURE S.P.A.;
- Pursuing general objectives to ensure the continuous improvement of the Integrated System, defining suitable indicators to evaluate the level of achievement and, consequently, verifying the adequacy of the Company Policy in order to adjust it to any evolving requirements that may arise. These evaluations are conducted during the Management Review, carried out at least once a year.

Building on these general objectives, Management defines, with the participation of Company Functions, specific annual objectives measurable through appropriate indicators that allow the collection of necessary data to define improvement actions for the processes and services provided by BTP INFRASTRUTTURE S.P.A., with actions aimed at:

- Ensuring the continuous operation of the Integrated Management System for Health, Safety, Environment, Quality, and Social Responsibility, and its dissemination to all staff;



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- periodically verifying supplier performance, both in terms of the quality of their supplies and compliance with declared contractual requirements, such as insurance coverage for their employees, knowledge of health and safety requirements, availability of suitable PPE for workers, payment of social security contributions or other taxes required by law, compliance with national labor agreements, etc.;
- Ensuring that the activities of BTP INFRASTRUTTURE S.p.A. are managed to prevent accidents, injuries, and occupational diseases. The design, operation, and maintenance of the workplace (including machinery, systems, offices, etc.) should aim to achieve this purpose;
- Ensuring compliance with laws regarding worker health and safety;
- Encouraging activities aimed at energy saving, waste separation, and, more generally, environmental protection.

SOCIAL RESPONSIBILITY STANDARD SA 8000

BTP INFRASTRUTTURE has aligned its activities with the Social Responsibility requirements described by the International Standard Social Accountability 8000 (SA 8000), a voluntary and auditable standard based on the Universal Declaration of Human Rights, documents adopted by the International Labour Organization (ILO), and other standards regarding human and labor rights, as well as national laws. This alignment aims to value and protect all personnel within the sphere of control of BTP INFRASTRUTTURE, including internal staff, consultants, suppliers, and subcontractor.

The Social Responsibility requirements cover the following aspects:

- 1) Child Labor;
- 2) Forced or compulsory Labor;
- 3) Health and Safety;
- 4) Freedom of association and the right to collective bargaining;
- 5) Discrimination;
- 6) Disciplinary practices;
- 7) Working hours;
- 8) Remuneration;
- 9) Management system.

These requirements may be fully or partially mandated by local or national laws. Where the SA 8000 Standard addresses the same topic as local or national laws or other standards or requirements referenced by the organization, BTP INFRASTRUTTURE applies the provision that is most favorable to workers.

The contents of this document are intended as requirements for all those who work for and/or collaborate with BTP INFRASTRUTTURE S.P.A.; therefore, Management encourages and supports maximum participation and engagement to ensure the effectiveness and continuous improvement of the Integrated System.

Management is committed to ensuring that these objectives are in line with the company's actual capabilities, in accordance with available technologies and market logic, so as not to compromise the health, safety, and well-being of personnel, or the protection of their rights and environmental rights.

Rome, 24 September 2025

Ing. Guido Balbo di Vinadio
(Presidente)