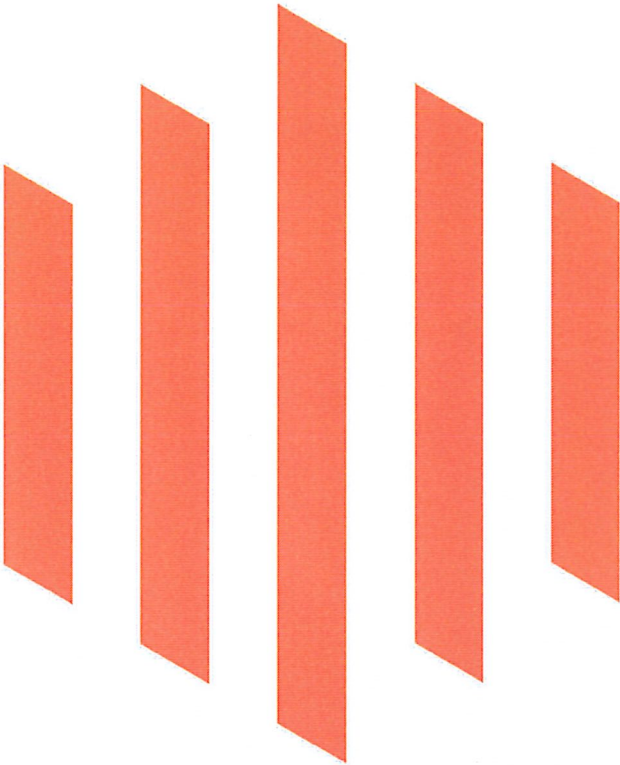


INTEGRATED MANAGEMENT SYSTEM POLICY

(Quality – Environmental – Safety – Information Security)

Developed in accordance with
ISO 9001:2015 – ISO 14001:2015 – ISO 45001:2018 – ISO/IEC 27001:2022

REFERENCE CHAPTER 5.2 OF THE INTEGRATED MANAGEMENT SYSTEM MANUAL [Rev. 4.0 - 15/02/2024]



Management. Engineering. People.

Revision History

Rev. #	Date	Description / Main Changes	Prepared by	Reviewed by	Approved by
1.7	30/06/2016	First Issue	J.Benedetti	C.Mason	U.Sgambati
2.1	02/10/2017	Rebranding; Extension of Scope	J.Benedetti	C.Mason	U.Sgambati
2.2	05/12/2017	Policy Updates	J.Benedetti	C.Mason	U.Sgambati
3.1	02/07/2018	Transition to ISO45001 standard	J.Benedetti	C.Mason	U.Sgambati
3.2	12/07/2019	New process mapping and BIM integration	J.Benedetti	C.Mason	U.Sgambati
4.0	15/02/2024	Integration of information security management system	IMS J.Benedetti	Corporate Functions C.Mason	Chairman U.Sgambati
4.1	30/04/2024	Inclusion of climate change issues	IMS J.Benedetti	Corporate Functions C.Mason	Chairman U.Sgambati



INTEGRATED MANAGEMENT SYSTEM POLICY

ESTABLISHING THE QUALITY, ENVIRONMENTAL, SAFETY AND INFORMATION SECURITY POLICY

Proger's integrated management system is based on the Integrated Management system Policy, defined by the Top Management, which provides the structural framework for the specific objectives.

Proger's mission is to become a general engineering company of excellence, capable of offering innovative products and services and integrating itself with the objective of consolidating our leading role within the Engineering and Management services internationally.

Proger's Quality, Environment, Health and Safety, and Information Security Policy states that the company should:

- Strengthen its role in civil society, through proactive and constructive actions in order to promote and foster cultural, social and economic development of the territory;
- Ensure customer satisfaction, understand the real needs, and create products and services that exceed the expectations;
- Offer quality and reliable products and services ensuring the Client's satisfaction. Work with external partners, leveraging the experience gained;
- Comply with the standards identified in the Integrated Management System;
- Optimize the interaction between the various business processes, for efficiency and profit and strive for continuous improvement of the performance of individual processes;
- Use concrete data to define measurable objectives and to assess their achievement;
- Engage the staff in achieving business goals, empowering them to take responsibilities, providing feedback, enhancing the contribution of each and stimulating effective internal communication;
- Acquire and maintain the necessary professional competence through recruitment and training of resources;
- Effectively communicate with both internal and external stakeholders;
- Respect the relevant laws and applicable regulations;
- Provide staff with the necessary and appropriate infrastructure, tools and Personal Protection Equipment in order to do their job;
- Create an environment that allows and stimulates top performance by employees, consultants and suppliers;
- Acknowledge and understand the context, with respect to aspects of climate change, that influence the company's ability to achieve its objectives;
- Identify and assess risks, opportunities and consequent actions, with respect to climate change, and in particular taking into account both the impact of the company with respect to climate change and its impact on financial and organisational aspects
- Acknowledge and meet the needs of stakeholders, including those related to climate change;



- Actively assess and address the implications of climate change in its own activities and in its strategic improvement planning for a transition towards sustainability and to respond to relevant stakeholder demands in this regard, seeking to invest in sustainable and long-lasting solutions that help the planet and future generations.
- Continue to develop projects with a reduced environmental impact, supporting the client in identifying and applying the best sustainability strategies and approaching each project with the utmost and constant attention to the environment through the analysis, evaluation and preparation of mitigation and optimisation solutions for all environmental aspects of each project, also in consideration of climate change.
- Develop local content (resources, procurement) in conformity to applicable law;
- Create a partnership and mutual profit with suppliers and take measures to ensure that they apply similar quality, environmental, safety and information security management standards;
- Protect the environment, health and safety in all workplaces;
- Establish responsibilities and procedures to ensure adequate management of direct and indirect health and safety aspects related to Proger's activities (including procedures to check use of alcohol and drugs);
- Implement and manage adequate procedures to ensure that all the working premises are free from all substances (i.e. alcohol and drugs) that could impair the employee's work performance and safety;
- Ensure that their activities are conducted in strict compliance with local current safety and environmental legislation and any codes of practice;
- Continuous assessment, monitoring and control of all potential security threats for all resources (people, equipment, tools) in national and international contexts.
- Produce and distribute through predefined means, regular updates and ad-hoc alerts on security issues to all personnel employed overseas;
- Pursue waste reduction while promoting policies for waste collection, recycling and optimal management of packaging and thereby improving the organization and supervision of production processes;
- Prepare measures to ensure that all suppliers, within Proger, provide services and products by applying quality methods that respect the environment, health & safety in the workplace, as well as, as far as applicable, that adequately protect the information and the systems of exchange and conservation information
- Assess the environmental effects that may be caused by its activities by taking steps to prevent or eliminate pollution, or to reduce their impact and related to global climate change;
- Evaluate the potential Health & Safety impacts of final products defined as project deliverables and services (design development, construction management, project management, etc.)
- Optimize the consumption of energy resources, taking into account the potential use of clean technologies;
- Monitor the CO2 consumption during the planning of flights for business trips;
- Promote, among the human resources involved in the company at all levels (including external either as suppliers or employees), the sense of responsibility towards the environment, health and safety,



information security through training and awareness workshops, related also to every action addressed to fight global climate change;

- Focus on the continuous improvement of quality performance, environmental business processes, and health and safety statutory and regulatory requirements as well as the expectations of its customers; continuously seek and pursue the continuous improvement of information security processes at all levels
- Engage and consult company workers into the definition, development, yearly planning and performance evaluation for the improvement of the Integrated Management System in Health and safety regards;
- Commit to the prevention of occupational accidents and diseases and include a commitment to continual improvement of the management of health and safety and the performance of the integrated management system;
- Safeguard the security of information, especially those considered critical for the purposes of personal data protection and corporate business, which constitutes an essential key element to be taken into account in future organizational evolution, making it an entrepreneurial and organizational culture tool as well as one of the inspiring principles of knowledge creation and management;
- Make the respect, evaluation and satisfaction of the requests and unexpressed needs of the customer as an essential requirement as well as the safeguarding of information regarding aspects relating to:
 - **Confidentiality:** ensure that information is accessible only to those who are authorized to access it.
 - **Integrity:** safeguarding the accuracy and completeness of the information and the methods for processing it.
 - **Availability:** Ensure that authorized users have access to information and associated assets when required.
 - **Resilience:** ensuring that the information systems that process the data have operational continuity aimed at facing probable adversities to systems and processes resulting from accidental and/or intentional events.
- Confirming its Ethical and Social commitment by committing itself to guaranteeing the respect and defence of human rights and promoting and supporting the principles of Social Responsibility, Gender Equality, Diversity and Inclusion. In this sense it is committed to implementing policies that ensure socially responsible behaviour in the performance of its business activities, acting in favour of gender equality, inclusiveness, and valuing the diversity of people by enabling them to develop their potential.
- Ensure climate change management at all stages of each process, where all employees of the company are involved in achieving the established climate change objectives.

COMMUNICATING THE QUALITY, ENVIRONMENTAL, HEALTH AND SAFETY, AND INFORMATION SECURITY POLICY

In order to achieve the expected results, Proger aims to achieve the objectives through:

- Effective communication of the aforementioned policy both internally and externally;



- Effective communication to all personnel working in the organization, through the publication of the same as documented information in the following areas:
 - Corporate intranet website (where available).
 - Notice boards (main offices and branches).
- When required by the local applicable regulations, this IMS policy is also published in the local language.
- When required by customers the policy may be distributed as an extracted section from this manual;



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