



# COMPANY POLICY

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EUROPEA MICROFUSIONI AEROSPAZIALI S.P.A., hereinafter referred as EMA, consists of a single industrial complex located in the municipality of Morra De Sanctis, Province of Avellino, Campania, Italy and is part of Rolls-Royce Group.

**The company manufactures cast in heat resistant super alloys for aerospace, industrial, and derived, rotor and stator components, obtained from castings of alloys in refractory shells by the lost wax process modelling, mechanical, chemical and non-destructive tests carried out also by X-rays.**

The **corporate mission** of EMA is to develop the Business activity taking profit by producing and distributing its products, operating in an environment characterized by high technological complexity and high competitiveness conditions, according to criteria of quality, environmental respect, energy efficiency, health and safety of workers in the workplace, safety and protection of information, same job opportunities, ensuring the protection of diversity and promoting social inclusion in order to create a corporate environment in which everyone can benefit from fair treatment and directing their activities to the sustainable research, to the use of advanced technologies to aim for excellence over time and facilitate the opportunities to improve customer satisfaction.

The Top Management, as part of a development strategy, follows the Quality objectives, respect for the Environment, Energy Efficiency and Health and Safety in the workplace and Gender Equality by using an Integrated Management System in compliance with BS EN ISO 9001, EN 9100, UNI EN ISO 14001, UNI CEI EN ISO 50001, UNI ISO 45001 and the ex Legislative Decree no. 231/2001, and in accordance with UNI/PDR 125:2022 as well as an Information Security Management System compliant with the UNI CEI EN ISO / IEC 27001 standard.

In this direction, the Top Management commitment is to determine the external and internal factors, as well as human factors, relevant to the purposes of the company and affecting its ability to achieve the objectives set for its management system, to provide rapid and effective responses to the market growing needs in terms of Quality, Health and Safety of persons in the workplace, product reliability and safety, respect for the Environment, energy efficiency and information security in addition to understanding and satisfying the needs, the requests of customers and all interested parties also collaborating in the solution of their problems with targeted, effective and efficient interventions.

The Top Management has confirmed the participation to the EMAS European Regulation to continue the engagement in environmental matters that have been always at the centre of EMA focus and to intensify the clarity and transparency with the community and to increase the level of environmental communication towards the outside (E).

EMA, aware of the high natural and landscape value of the territory and the importance of its protection, keeps under control the activities related to business processes that directly or indirectly may have an impact on the environment and sustainability (E).

Furthermore, EMA, both in the choice of plants, equipment and materials and in their management, pursues objectives of maximum protection of Health and Safety, improvement of energy performance and environmental protection (**Q, HS, E, En, IS, GE**).

The choice of EMA aims to assume a role of direction for all companies and organizations present in the area, acquiring trust through supplies of excellence "Trusted to Deliver Excellence" (**Q, HS, E, En, IS, GE**).

EMA, in pursuing its goal of consolidating a position of technological excellence in the sector in which it operates, is committed to equipping itself with cutting-edge equipment and systems, to developing applied research projects and to focusing on the continuous development of the level of staff training (**Q, HS, E, En, IS**).

The Management and all company personnel are also committed to ensuring the confidentiality, integrity, availability and resilience of physical and electronic information assets and personal data processed by the Organization, in order to preserve the competitive advantage, profitability, rights and freedoms of the interested parties and, at the same time, guarantee legal, regulatory and contractual compliance, as well as the consequent positive return of image on the market that the adoption of a serious protection of data security and privacy is able to generate (**Q, HS, E, En, IS, GE**).

EMA commits, in particular:

- to create the belonging and responsibility sense in the persons, including workers and employee representatives towards the corporate goals using the knowledge, continuous training, education and experience, to reach the involvement in operational decisions and the active participation and consultation in the process improvements so that they identify themselves as the primary acting for the business results and contributing in the company grow (**Q, HS, E, En, IS, GE**);
- a recognises the value of diversity and in the selection phase to identify candidates representative of both genders (**GE**);
- implement objectives and monitoring in the work environment by promoting respect for "diversity" and the protection of the psycho-physical well-being of employees (**GE**);
- to achieve a situation as equal as possible between genders with the same skills and professionalism (**GE**);
- to implement corporate welfare policies to support employees (**GE**);
- to actively involve management on the issues of gender diversity and social inclusion, employment and professional growth of each individual (**GE**);
- to verify the application, suitability, adequacy, efficiency and effectiveness of the Integrated Management System for Quality, Environmental Protection, Energy Efficiency, Health and Safety of workers and the Management System for Information Security (**Q, HS, E, En, IS, GE**);
- to periodically review the management system to ensure continuous improvement of the organization (**Q, HS, E, En, IS, GE**);
- to develop the business by pursuing the acquisition of new contracts and maintaining existing levels by means of absolute customer satisfaction (**Q, HS, E, En, GE**);
- to optimize capital investment in energy efficiency (**E, En**);
- to develop the supply chain, also by the establishment of business networks, so that to increase the competitiveness of the product on the market and share the business costs (**Q, HS, E, En**);
- to determine effective processes to conduct of business activity, for the control of the supply chain and for the management of resources (**Q, HS, E, En, GE**);
- to continually improve the effectiveness and efficiency in its operations and processes using "lean" principles by focusing on customer value-added activities and eliminating waste (**Q, E, En**);
- to ensure reliable energy supplies, adequate and with more affordable costs (**Q, E, En**);
- to plan and control company activities with the scope to rigorously maintain the contractually agreed commitments, addressing risks and opportunities associated with the internal and external context, with the needs and expectations of stakeholders and workers and with the objectives (**Q, HS, E, En, IS, GE**);
- to maintain an open dialogue with customers to measure and increase the degree of satisfaction and transpose all the motivations in order to improve its performance (**Q, HS, E, En**);
- to establish appropriate controls to ensure product conformity, configuration management processes and prevention to the use of counterfeit parts (**Q**);
- to build its reputation and expand its business by the pursuit of engineering excellence and the acquisition and maintaining of required operational knowledge (**Q, HS, E, En**);
- to prevent of defects and reduce scraps and waste (**Q, HS, E, En**);
- to use simulation processes to reduce the time for deployment and testing of changes and use of resources for development (**Q, HS, E, En**);
- to comply with current legislation and regulations on the environment, energy, health and safety of workers, safety and confidentiality of information and personal data, both community and national and / or local and customers and / or interested parties if more restrictive as well as any other compliance obligation signed by it (**Q, HS, E, En, IS, GE**);
- to implement adequate measures for the protection of Health, Safety of employees, third parties and the surrounding community over which the carried out activities may have an influence (**HS**);
- to identify and keep updated the aspects and the direct and indirect environmental aspects arising from activities, products and services within its competence or activities carried out by third parties and customers, on which the Company can exercise influence; this in order to define and achieve objectives and targets to improve environmental performance and protection of the health and safety of workers in the workplace (**HS, E, En**);
- to inform, educate and involve all internal and/or external persons involved in the activities of the EMA on the importance to satisfy the requirements of customers, legal requirements and other requirements and those statutory, the analysis, the awareness and proper training on "Human Factors" and on environmental issues, energy and health and safety management, confidentiality of information and on the importance of the policy for the product safety and reliability, promoting a widespread sense of responsibility (**Q, HS, E, En, GE**);
- to optimize the use of raw and auxiliary materials and to promote cost reduction initiatives (**Q, E, En**);
- to limit and manage at best the use of dangerous substances and mixtures in all processes and activities, through the search of an alternative material that is less dangerous for the health of employees and that has less impact on the environment and anyway using adequate and effective personal protective equipment (**HS, E, En**);
- to maintain liquid discharges, acoustic emissions, ionizing radiation or not, vibration and smells in the condition of minimum pollution and in conditions that ensure the protection of the health and safety of workers (**HS, E**);
- to improve visual and micro-climatic conditions in the workplace, paying attention also to the synthetic risk index in the manual handling of loads (**HS**);
- to organize the workplace and production flows reaching the maximum effectiveness, efficiency and productivity (**Q, HS, E, En, GE**);



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- to use an effective production planning and control system, based on widespread availability of data, the analysis of plant capacity and human resources, the monitoring and management of product configuration to improve the quality and repeatability of operations reducing the use of resources applying sustainability principles (**Q, HS, E, En, GE**);
- to communicate with the relevant public authorities to establish and update emergency, safety and environmental protection procedures and to undertake dialogue actions with all interested parties (P.A., local communities, associations, other companies, customers, etc.) (**HS, E, En, GE**);
- to efficiently use the natural resources necessary to the process, such as energy and water, promoting consumption reduction activities (**E, En**);
- to manage waste identifying the best possibilities for the reuse (**E, En**);
- to reduce and cut emissions into the atmosphere (**E**);
- Eliminate hazards and reduce risks (**HS**);
- to limit and/or replace the use of substances harmful to the environment (**E**);
- to upgrade plants and processes to the safer and more effective technologies to prevent incidents and professional illness and for the prevention of pollution and/or reduction of environmental impacts (**HS, E, En, GE**);
- to maintain plants and equipment in a perfect state of efficiency through preventive and predictive maintenance programs and control systems of process parameters (**Q, HS, E, En**);
- to manage, design and implement new activities, or any changes to existing ones, in order to take in due account the interactions with different environmental compartments, with the local context of the site in order to monitor the impacts themselves, the safety and sustainability aspects (**HS, E, En, GE**);
- to support the design and purchasing of energy efficient products and services aimed to improve the energy performances (**E, En**);
- to continually improve the health and safety performances, not only in terms of prevention of accidents and occupational diseases, but also through a general improvement in psycho-physical conditions (**HS, GE**);
- to improve the welfare of workers and their families, even away from the workplace, with appropriate forms of assistance (**HS, GE**);
- to manage the company "assets", both tangible (plants, machinery, stocks, etc.) and intangible assets (know-how, trademarks, licenses, etc.) in accordance with accounting principles complying with current civil and fiscal regulations and anyway according to the "diligence of a good family father" (**Q**);
- to continuously improve the products safety actively operating to define industry best practices (**Q, HS**);
- to measure their own performances investigating and solving problems related to product safety and encouraging all employees to report any concerns about the product safety (**Q, HS**);
- to clearly define the responsibilities related to product safety and ensuring that those ones holding leadership roles be champions of product safety, giving to that the priority so that the related activities receive consideration, adequate time and resources (**Q, HS**);
- take appropriate measures in the areas of business continuity, data storage procedures, protection against malware and intrusions, control of access to systems and reporting mechanisms in the event of information security issues. Control indicators for each of these areas are defined in the System documentation and supported by specific procedures (**IS**).

This Policy is the reference structural framework for the definition and review of the objectives for Health and Safety, Environment, Energy, Quality, Information Security and Gender Equality, which are established and verified by the Top Management at least annually, during the Review, and assigned to each business function (**Q, HS, E, En, IS, GE**).

EMA's strategic plans and its risk management framework provide the framework for identifying, analyzing, assessing and controlling risks related to Information Security, through the implementation and maintenance of an Information Security Management System (IS) which, together with the Organizational Model on Personal Data Protection adopted, represents the tool that allows the sharing of Information, the carrying out of correct operations and the reduction of risks associated with the processing of information to acceptable levels (**IS**).

The Top Management undertakes with regard to its Management Systems and in compliance with what has been agreed with customers, workers and / or interested parties:

- taking responsibility for the continuous improvement of the suitability, adequacy and effectiveness of the Integrated Management System so that it achieves the expected results by appropriately structuring the training, the risk analysis connected to "Human Factors" with open reporting and guaranteeing continuous improvement in mature implementation of the Human Factor within your organization (**Q, HS, E, En, IS, GE**);
- defining the roles and responsibilities in the management of the processing carried out on company information and in particular on personal data, their identification and the related analysis of the risks to which they may be subject (**IS**);
- establishing the present policy in a way appropriate to the EMA scope and the context and in a way to support its strategic directions, to re-examine that to verify and assure it is continuously actual, adequate and appropriate (**Q, HS, E, En, IS, GE**);
- ensuring that objectives are established and re-examined supporting the Quality, the Environmental and Energy management and Health and Safety of workers in the workplaces and Information Security and that the quality objectives are compatible with the context and company strategic directions (**Q, HS, E, En, IS, GE**);
- ensuring that the requirements for the security of information and personal data are consistent with the objectives of the Organization and operating procedures (**IS**);
- ensuring the integration of the Integrated Management System in company business processes (**Q, HS, E, En, IS, GE**);
- protecting the environment by using sustainable resources, mitigating and adapting to climate change and the protection and the biodiversity of the ecosystems (**HS, E, En**);
- promoting the use of process approach and the risk determination as base for the planning of the activities (*risk-based thinking*) (**Q, HS, E, En, IS, GE**);
- committing to provide the resources necessary for the development and implementation of the Integrated Management System and to continually improve its effectiveness and to meet the applicable requirements (**Q, HS, E, En, IS, GE**);
- ensuring that the present policy is applied, communicated, consulted and understood within the organization to ensure that all staff are fully aware of the objectives stated by the Company and the importance of an effective management of the IMS and of the conformity to the requirements (**Q, HS, E, En, IS, GE**);
- promoting continuous improvement and committing to lead, support and actively participate the persons so that they contribute to the IMS effectiveness; in addition, he support other relevant management roles to demonstrate their leadership as it applies to their areas of responsibilities (**Q, HS, E, En, IS, GE**);
- ensuring that the customer requirements and applicable statutory and regulatory are determined, understood and consistently met with the aim of increasing customer satisfaction and that performances in terms of product conformity and on-time delivery are measured and appropriate action is taken if planned results are not, or will not be, achieved (**Q, HS, E, En, IS, GE**);
- ensuring that the risks and opportunities that may influence the expected outcomes of the Integrated Management System and the conformity of products and services to the requirements and the ability to increase the customer, workers and/or stakeholder satisfaction are determined and addressed (**Q, HS, E, En, GE**);
- ensuring that all the subjects involved belonging to the Organization and any stakeholders, considered within the perimeter defined within the scope of application of the Information Security Management System, as well as managers external to the Organization who process personal data on behalf of the Data Controllers and the autonomous Data Controllers, with whom the Company has decided to share some of its treatments, behave in accordance with the provisions of this Policy, the Organizational Model and the Management System that implements it. For this purpose, all human resources and personnel involved in the processing of personal data are subject to formal appointment in the field of privacy and receive the necessary and appropriate training in this regard.

This Policy, relevant and appropriate, is periodically reviewed in order to consider any change in the risk assessment and, consequently, in the related treatment plan, and is made available to interested parties, to anyone who explicitly requests it. It is disseminated through posting on company premises, in the Environmental Statement, on the Company's website and is maintained as company documentation.

Managing Director

Morra De Sanctis (AV), date 09<sup>th</sup> September 2024

**Eng. Domenico SOTTILE**

**NOTE: the main relevancies to the arguments have been reported in parentheses: Q=Quality, HS=Health & Safety, E=Environment, En=Energy, IS=Information Security, GE=Gender Equality**