



Ethics, integrity, excellence in products and services, occupational health and safety, environmental protection, inclusion, diversity and equity, and information security are the values that underpin the relationships between the SAG Group companies and their stakeholders.

Based on these Values, the companies of the SAG Group are committed to acting in compliance with all applicable laws and best organizational and management practices, promoting continuous improvement. This commitment is reflected in the adoption of organizational tools for managing quality, the environment, health and safety, gender equality, and information security.

The signing of this Integrated Policy document confirms the commitment to fully implement it and make it available to all interested parties. The companies of the SAG group are committed to using all available means to counteract any behaviour that is contrary to the principles underlying this Policy and to update its contents in line with regulatory developments and corporate strategy.

The CEO of SAG GROUP entrusts the Management Systems Manager with the responsibility and authority necessary to oversee the implementation, maintenance, and continuous improvement of the Integrated Management System.

The Management Systems Manager will ensure that:

- Each SAG Group company is clearly mapped in terms of processes and that each business process is regularly monitored using specific indicators and targets;
- Roles and responsibilities are clearly defined and assigned according to suitable profiles and skills;
- Regulations, provisions issued by the relevant bodies, and specific customer requirements are observed, all in accordance with ethical integrity and professional correctness;
- The Management System extends to third parties, in particular to suppliers of products and services;
- A Management Review is carried out at least annually in order to analyze the results of the Management System and individual processes and the effectiveness of action plans, and to assign new targets;
- Staff is informed about the results achieved, changes made to the Management System, and opportunities for improvement currently being considered;
- This document is displayed in company areas and published on the website to ensure transparency and accessibility to all interested parties.



PRODUCT AND SERVICE QUALITY

The excellence of our products, supported by an excellent level of service, aims to satisfy our customers and all stakeholders.

The essential tool for achieving this goal is the Quality Management System, applied in accordance with UNI EN ISO 9001:2015 and IATF 16949:2016 standards.

The companies of the SAG Group are committed to optimizing the performance of the production system to improve its efficiency and reduce the costs of non-quality through a process of continuous improvement.

The Quality Management System aims to ensure coordination among the SAG Group companies, defining a common language and working method, while preserving the specific traits of each company, allows for the sharing of solutions, experiences and resources, and enables the Group to present itself to customers as a coherent whole.

The main objectives for the coming period are as follows:

- Update, complete, maintain, and harmonize Quality Management Systems
- Support Quality Management System certification activities
- Standardize operational tools for recording quality/production/supplier/customer data.
- Support strategic visits by customers (audits, prequalifications, escalations, etc.)



HEALTH AND SAFETY

The companies of the SAG Group consider Occupational Health and Safety to be a fundamental value.

For this reason, they all have adopted a Management System compliant with the UNI EN ISO 45001:2018 standard, with the goal of continuously improving their performance and meeting the expectations of the stakeholders.

Furthermore, they are also committed to promoting a corporate culture focused on workers' health and safety and continuous improvement of their performance through a systemic and inclusive approach.

The companies of the SAG Group are committed to:

- Integrating safety aspects as early as the design stage of plants, departments, and activities;
- Complying with current regulations on health and safety at the workplace;
- Actively involving all members of staff and strategic suppliers in responsible risk management;
- Promoting training, information, and continuous learning for all employees;
- Promoting cooperation between the various company resources, in particular through the consultation and participation of workers, including through their representatives;
- Adopting sustainable technologies and practices to improve working conditions.



ENVIRONMENTAL PROTECTION

The companies of the SAG Group consider environmental protection to be a fundamental value.

For this reason, they have adopted a Management System compliant with the UNI EN ISO 14001:2015 standard, with the aim to continuously improve their performance and meet the expectations of the stakeholders.

Furthermore, they are committed to promoting a corporate culture focused on environmental protection and continuous improvement of their performance through a systemic and participatory approach.

The companies of the SAG Group are committed to:

- Integrating environmental aspects right from the design stage of plants, departments, and activities;
- Identifying, assessing and managing climate change risk both at your site and along the supply chain;
- Complying with current environmental regulations;
- Actively involving all staff and strategic suppliers in responsible risk management;
- Promoting training, information, and continuous education for all staff;
- Adopting sustainable technologies and practices to reduce environmental impact.



INFORMATION SECURITY AND PERSONAL DATA PROTECTION

All SAG Group companies are aware that the information they hold is of strategic importance and represents a significant asset not only for the company but also for customers and stakeholders, and must therefore be protected.

Furthermore, it considers it essential to guarantee the protection of individuals with regards to their personal data, committing itself to processing such data in full compliance with current regulations and following the best practices currently available.

For this reason, SAG Group companies adopt national and international standards such as TISAX and ISO IEC 27001:2022 as a reference, in addition to the relevant binding regulations, such as the European Data Protection Regulation and Directive EU 2022/2555 (“NIS2”).

The SAG Group companies have identified the following as their main strategic objectives:

- Guarantee the confidentiality, integrity, and availability of their information (both business and personal), as well as that of their employees and customers, ensuring that it is managed in accordance with national and international regulatory requirements, contractual obligations, and the standards to which the company adheres.
- Integrate the requirements of the information and personal data security management system into business processes, keeping the information security management system up to date, monitored, and focused on continuous improvement.
- Assign roles and responsibilities to qualified and competent personnel, free from conflicts of interest and subordination, in order to outline clear management of information and personal data security in terms of: governance, incident management—including data breaches—crisis management, and business continuity.
- Be receptive to the risks and opportunities of the external and internal environment, in order to promote an up-to-date understanding of the possible impacts that may affect the information (including personal data) managed by the company and encourage a prompt response.
- Train and raise awareness among employees on information security and personal data protection, on the management system implemented and related policies, procedures, and regulations, on potential risks—which are increasingly frequent and complex—and on how to prevent them.
- Communicate with the competent authorities and stakeholders about events affecting information security and personal data that may have a significant impact on them, in accordance with contractual agreements and national and international regulations and keep the records necessary to reconstruct the events and their causes.



- Adopt appropriate physical and technological prevention measures and prepare response plans for the management of crises, incidents, and data breaches or potential breaches, ensuring appropriate measures to preserve the continuity of information and personal data security.
- Ensure that the security of information and personal data is also maintained by its supply chain and by the technologies used by SAG Group companies, sharing with its collaborators the security standards that the Company expects within the collaborative relationship and clearly and transparently dividing the responsibilities of the parties for the security of the information exchanged in the contractual collaborative relationship, also with reference to current legislation.
- Prevent copyright infringement by monitoring the software used, whether online or licensed, also in view of the introduction of artificial intelligence.
- Assess the company's information and personal data security management system, including through third-party independent and qualified bodies.

Appendix 1 contains the Information Security and Personal Data Protection Policy specific to SAGOM TUBI and SAGOM RUBBER, certified according to the TISAX standard.



INCLUSION, DIVERSITY AND EQUITY, GENDER EQUALITY

With the aim of carrying out its mission in the best way possible and in line with its strategic vision, the SAG Group companies have decided to adopt a Gender Equality Management System based on the UNI/PdR125:2022 standard as a valid tool for ensuring gender equality in terms of the presence and professional growth of women, promoting an inclusive culture and implementing processes capable of developing female empowerment.

The fundamental principles underlying the Gender Equality Policy are impartiality and inclusiveness, fairness and transparency, staff recognition, personal protection, and opposition to all forms of violence and discrimination.

The companies of the SAG Group have identified the following as their main strategic objectives:

- increasing women's participation in the labor market;
- reducing the pay and pension gap between men and women, also to tackle female poverty;
- promoting equality between men and women in decision-making;
- combating stereotypes and gender-based violence, and protecting and supporting victims.

To promote the achievement of the principles and objectives set out above, the management of the SAG Group companies commit itself to:

- adopting measures to prevent all forms of gender discrimination and to combat any act that undermines the dignity of staff, regardless of their role and level of responsibility;
- valuing diversity in every business process: from the search and selection of human resources to access to training, from the definition of remuneration policies to performance evaluation and the allocation of reward systems, from the selection of suppliers to the provision of services/supply of products;
- supporting the family welfare of its employees through working methods that promote a good work-life balance;
- promoting information, awareness, and engagement initiatives for staff on the issues of equal opportunities and female empowerment, avoiding stereotypes and promoting the visibility of women's contributions;
- promoting communication, including through marketing and advertising activities, that transparently declares the desire to achieve gender equality, value diversity, and support female empowerment.

Appendix 2 contains the Gender Equality Policy for SAG TUBI SpA, certified according to UNI PdR 125:2022 standards.


**COMMUNICATIONS AND REPORTS**

The companies of the SAG Group encourage people to report problems without fear of retaliation, in accordance with current laws and regulations: retaliation against people who make reports in good faith is prohibited. SAG Group companies have long had a reporting channel called Whistleblowing, accessible from the website and available to anyone who, anonymously or by providing their personal details, wishes to confidentially report their concerns about potentially illegal or unethical situations or behavior that is not consistent with the Code of Ethics.




APPENDIX 1

Information Security and Personal Data Protection Policy specific to SAGOM TUBI and SAGOM RUBBER companies.

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	<i>INFORMATION SECURITY AND DATA PROTECTION POLICY</i>	Classification: public

POLITICA PER LA SICUREZZA DELLE INFORMAZIONI E LA PROTEZIONE DEI DATI PERSONALI


INFORMATION SECURITY AND DATA PROTECTION POLICY

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	INFORMATION SECURITY AND DATA PROTECTION POLICY	Classification: public

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POLITICA PER LA SICUREZZA DELLE INFORMAZIONI E LA PROTEZIONE DEI DATI PERSONALI / INFORMATION SECURITY AND DATA PROTECTION POLICY

Sagom Rubber S.r.l. è consapevole che il proprio patrimonio informativo costituisce un ruolo di assoluto rilievo strategico e rappresenta un importante asset aziendale da tutelare.

Inoltre, considera essenziale garantire la tutela delle persone fisiche con riferimento ai loro dati personali, impegnandosi a trattare predetti dati nel pieno rispetto delle disposizioni vigenti in materia e seguendo le best practice al momento disponibili.

Per questo motivo, Sagom Rubber S.r.l. ha approvato la presente politica per la sicurezza delle informazioni e dei dati personali, avendo a riferimento standard nazionali e internazionali, quali TISAX e ISO IEC 27001:2022, oltre alle relative normative cogenti di riferimento, quali il Regolamento Europeo per la Protezione dei Dati e il Directive EU 2022/2555 ("NIS2").

La sicurezza delle informazioni e dei dati personali è intesa come il mantenimento di:

- riservatezza, ossia garantire l'accesso alle informazioni solo ai soggetti autorizzati;
- integrità, ossia salvaguardare l'accuratezza e la completezza delle informazioni e delle modalità di trattamento;
- disponibilità, ossia garantire l'accesso alle informazioni e agli asset associati ai soggetti autorizzati che lo richiedono senza ritardi.

Inoltre, la protezione dei dati personali è intesa anche come:

- liceità, correttezza e trasparenza del trattamento nei confronti dell'interessato;
- limitazione della finalità del trattamento;
- minimizzazione dei dati: ossia i dati devono essere adeguati, pertinenti e

Sagom Rubber S.r.l. is aware that its information assets play a role of paramount strategic importance and represent a key corporate resource that must be protected.

Furthermore, it is considered essential to guarantee the protection of natural persons with reference to their personal data, undertaking to process the aforementioned data in full compliance with the provisions in force on the matter and following the best practice currently available.


For this reason, Sagom Rubber S.r.l. has approved this information security and data protection policy, having national and international standards, such as TISAX and ISO IEC 27001:2022, as a reference, in addition to the relevant mandatory reference regulations, such as the European Data Protection Regulation and EU Directive 2022/2555 ("NIS2").

Information and personal data security is understood as maintaining:

- confidentiality, i.e., ensure that only authorized individuals have access to information;
- integrity, i.e., safeguarding the accuracy and completeness of the information and treatment modalities;
- availability, i.e., ensure access to information and associated assets to authorized parties who request it without delay.

Furthermore, the protection of personal data is also understood as:

- lawfulness, correctness and transparency of the processing towards the data subjects;
- limitation of the purpose of the processing;
- data minimization: that is, the data must be adequate, relevant and limited to what is

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limitati a quanto necessario rispetto alle finalità del trattamento;

- esattezza e aggiornamento dei dati, compresa la tempestiva cancellazione dei dati che risultino inesatti rispetto alle finalità del trattamento;
- limitazione della conservazione.

necessary in relation to the purposes of the processing;

- accuracy and updating of the data, including the timely deletion of data that are inaccurate in relation to the purposes of the processing;
- limitation of retention.

Sagom Rubber S.r.l. si impegna a garantire quanto sopra per le informazioni (compresi dati personali) non solo proprie aziendali, ma anche dei propri clienti, dipendenti e stakeholders in genere, applicando come cultura aziendale, i principi del need to know (necessità di sapere), del least privilege (privilegio minimo), risk-based thinking e privacy e security by design & by default.

Sagom Rubber S.r.l. is committed to ensuring all the above for not only the company's own information (included personal data), but also that of its customers, employees and stakeholders in general, applying as a corporate culture, the principles of need-to-know, least privilege, risk-based thinking and privacy and security by design & by default.

A fronte di questo impegno e sulla base di tali principi, Sagom Rubber S.r.l. ha implementato un Sistema di Gestione per la Sicurezza delle Informazioni e dei Dati Personali, quale meccanismo di controllo che, tramite misure organizzative, fisiche, tecnologiche e relative alla gestione del personale, permettono al Management di garantire che la sicurezza delle informazioni (compresi dati personali) sia il risultato di una gestione sostenibile piuttosto che quella di una mera coincidenza e di uno sforzo individuale.


As a result of this commitment and based on these principles, Sagom Rubber S.r.l. has implemented an Information Security and Data Protection Management System as a control mechanism that, through organizational, physical, technological and personnel management measures, allow Management to ensure that information security (included personal data) is the result of sustainable management rather than that of mere coincidence and individual effort.

Infatti, Sagom Rubber S.r.l. crede che la sicurezza raggiungibile solamente attraverso le misure tecniche è limitata e deve essere supportata da procedure di gestione della sicurezza delle informazioni adeguate, un monitoraggio costante del Sistema, orientato al rischio e sempre teso al miglioramento, oltreché formazione e sensibilizzare degli attori coinvolti.

In fact, Sagom Rubber S.r.l. believes that security achievable only through technical measures is limited and must be supported by appropriate information security management procedures, constant monitoring of the System, risk-oriented and always striving for improvement, as well as training and raising awareness of those involved.

Sagom Rubber S.r.l. è infatti consapevole che la sicurezza delle informazioni e dei dati personali è il risultato tangibile della partecipazione e impegno responsabile e competente di tutti: dipendenti, clienti e fornitori.


Sagom Rubber S.r.l. is indeed aware that information security and data protection is the tangible result of the responsible and competent participation and commitment of everyone: employees, customers and suppliers.

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Gli obiettivi per la sicurezza delle informazioni e la protezione dei dati personali di Sagom Rubber S.r.l. sono:


Sagom Rubber's information security and data protection objectives are the following:

- Garantire riservatezza, integrità e disponibilità delle informazioni (di business e personali) proprie, dei propri dipendenti e clienti, assicurando che siano gestite in accordo con obblighi normativi – nazionali e internazionali -, contrattuali e degli standard cui l'azienda aderisce.
- Integrare i requisiti del sistema di gestione per la sicurezza delle informazioni e dei dati personali all'interno dei processi aziendali, mantenendo il sistema di gestione per la sicurezza delle informazioni sempre aggiornato, monitorato e teso al miglioramento continuo.
- Assegnare ruoli e responsabilità a personale qualificato e competente, privi di conflitti di interesse e subordinazione, al fine di delineare una chiara gestione della sicurezza delle informazioni e dei dati personali in termini di: governance, gestione degli incidenti inclusi i Data Breach, la gestione delle crisi e della business continuity.
- Essere recettivi dei rischi e opportunità del contesto esterno ed interno, per favorire una sempre aggiornata comprensione dei possibili impatti che possono ricadere sulle informazioni (compresi dati personali) gestite dall'azienda e favorire una pronta risposta.
- Formare e sensibilizzare i dipendenti sulla sicurezza delle informazioni e sulla protezione dei dati personali, sul sistema di gestione implementato e relative policy, procedure e regolamenti, sui rischi
- Ensure confidentiality, integrity and availability of its own information (business and personal) and that of its employees and customers, ensuring that it is managed in accordance with regulatory obligations – national and international –, contractual obligations and standards to which the company adheres.
- Integrate information security and data protection management system requirements within business processes, keeping the information security management system constantly updated, monitored and aimed at continuous improvement.
- Assign roles and responsibilities to qualified and competent personnel, free from conflicts of interest and subordination, in order to outline a clear management of information security and data protection in terms of: governance, incident management, including Data Breach, crisis management and business continuity.
- Be receptive to the risks and opportunities of the external and internal environment, to promote an up-to-date understanding of the possible impacts that may impact on the information (included personal data) managed by the company and to encourage a prompt response.
- Train and sensitize employees on information security and data protection, on the management system implemented and related policies, procedures and regulations, potential risks – increasingly frequent and complex – and ways to prevent them.

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potenziali – sempre più frequenti e complessi – e le modalità per prevenirli.

- Comunicare con le autorità competenti e le parti interessate gli eventi per la sicurezza delle informazioni e i dati personali che possono avere un impatto rilevante sugli stessi, secondo gli accordi contrattuali e le normative nazionali e internazionali, e conservare le registrazioni necessarie alla ricostruzione degli eventi e delle relative cause.
- Adottare idonee misure – fisiche e tecnologiche – di prevenzione, e predisporre piani di risposta per la gestione delle crisi, incidenti e data Breach o potenziali tali; garantendo misure idonee a preservare la continuità della sicurezza delle informazioni e dei dati personali.
- Assicurare che la sicurezza delle informazioni e dei dati personali sia mantenuta anche dalla propria catena di fornitura e dalle tecnologie che Sagom Rubber S.r.l. utilizza, condividendo con i propri collaboratori gli standard di sicurezza che Sagom Rubber S.r.l. si aspetta all'interno del rapporto di collaborazione e ripartendo in modo chiaro e trasparente le responsabilità delle parti per la sicurezza delle informazioni scambiate nel rapporto contrattuale di collaborazione, anche con riferimento alla normativa vigente.
- Prevenire la perdita del diritto d'autore tramite il monitoraggio dei software utilizzati, siano essi usufruibili online o su licenza, anche in considerazione dell'introduzione della intelligenza artificiale.
- Valutare il proprio sistema di gestione per la sicurezza delle informazioni e dei dati
- Communicate with relevant authorities and interested parties information security and personal data events that may have a major impact on them, according to contractual agreements and national and international regulations, maintaining records necessary for reconstruction of the events and their causes.
- Adopt appropriate – physical and technological – prevention measures and prepare response plans for managing crises, incidents and data breaches or potential ones, guarantee appropriate measures to preserve continuity of information security and personal data.
- Ensure that information and personal data security is maintained by the supply chain as well as the technologies that Sagom Rubber S.r.l. uses, by sharing with its collaborators the security standards that Sagom Rubber S.r.l. expects within the collaborative relationship and by clearly and transparently allocating the responsibilities of the parties for the security of the information exchanged in the collaborative contractual relationship, also with reference to the current legislation.
- Preventing the loss of copyright protection through the monitoring of the software in use, whether accessed online or under license, also in view of the introduction of artificial intelligence.
- Evaluate the information security and personal data management system including

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personali anche tramite organismi
indipendenti e qualificati.

through independent and qualified third-
party companies.

Data/ Date

23/01/2025


La Direzione / Management

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VALIDITA' / VALIDITY


Il presente documento aziendale è valido immediatamente dopo la pubblicazione.
This Company Document is valid immediately after publication.

La Politica della sicurezza delle Informazioni è verificata annualmente in sede di Riesame di Direzione.
The Information Security Policy is verified annually during the Management Review.

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POLITICA PER LA SICUREZZA DELLE INFORMAZIONI E LA PROTEZIONE DEI DATI PERSONALI

INFORMATION SECURITY AND DATA PROTECTION POLICY

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POLITICA PER LA SICUREZZA DELLE INFORMAZIONI E LA PROTEZIONE DEI DATI PERSONALI / INFORMATION SECURITY AND DATA PROTECTION POLICY

SAGOM TUBI S.p.A. è consapevole che il proprio patrimonio informativo costituisce un ruolo di assoluto rilievo strategico e rappresenta un importante asset aziendale da tutelare.

Inoltre, considera essenziale garantire la tutela delle persone fisiche con riferimento ai loro dati personali, impegnandosi a trattare predetti dati nel pieno rispetto delle disposizioni vigenti in materia e seguendo le best practice al momento disponibili.

Per questo motivo, SAGOM TUBI S.p.A. ha approvato la presente politica per la sicurezza delle informazioni e dei dati personali, avendo a riferimento standard nazionali e internazionali, quali TISAX e ISO IEC 27001:2022, oltre alle relative normative cogenti di riferimento, quali il Regolamento Europeo per la Protezione dei Dati e il Directive EU 2022/2555 ("NIS2").

La sicurezza delle informazioni e dei dati personali è intesa come il mantenimento di:

- riservatezza, ossia garantire l'accesso alle informazioni solo ai soggetti autorizzati;
- integrità, ossia salvaguardare l'accuratezza e la completezza delle informazioni e delle modalità di trattamento;
- disponibilità, ossia garantire l'accesso alle informazioni e agli asset associati ai soggetti autorizzati che lo richiedono senza ritardi.

Inoltre, la protezione dei dati personali è intesa anche come:

- liceità, correttezza e trasparenza del trattamento nei confronti dell'interessato;
- limitazione della finalità del trattamento;
- minimizzazione dei dati: ossia i dati devono essere adeguati, pertinenti e

SAGOM TUBI S.p.A. is aware that its information assets play a role of paramount strategic importance and represent a key corporate resource that must be protected.

Furthermore, it is considered essential to guarantee the protection of natural persons with reference to their personal data, undertaking to process the aforementioned data in full compliance with the provisions in force on the matter and following the best practice currently available.


For this reason, SAGOM TUBI S.p.A. has approved this information security and data protection policy, having national and international standards, such as TISAX and ISO IEC 27001:2022, as a reference, in addition to the relevant mandatory reference regulations, such as the European Data Protection Regulation and EU Directive 2022/2555 ("NIS2").

Information and personal data security is understood as maintaining:

- confidentiality, i.e., ensure that only authorized individuals have access to information;
- integrity, i.e., safeguarding the accuracy and completeness of the information and treatment modalities;
- availability, i.e., ensure access to information and associated assets to authorized parties who request it without delay.

Furthermore, the protection of personal data is also understood as:

- lawfulness, correctness and transparency of the processing towards the data subjects;
- limitation of the purpose of the processing;
- data minimization: that is, the data must be adequate, relevant and limited to what is

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limitati a quanto necessario rispetto alle finalità del trattamento;

- esattezza e aggiornamento dei dati, compresa la tempestiva cancellazione dei dati che risultino inesatti rispetto alle finalità del trattamento;
- limitazione della conservazione.

necessary in relation to the purposes of the processing;

- accuracy and updating of the data, including the timely deletion of data that are inaccurate in relation to the purposes of the processing;
- limitation of retention.

SAGOM TUBI S.p.A. si impegna a garantire quanto sopra per le informazioni (compresi dati personali) non solo proprie aziendali, ma anche dei propri clienti, dipendenti e stakeholders in genere, applicando come cultura aziendale, i principi del need to know (necessità di sapere), del least privilege (privilegio minimo), risk-based thinking e privacy e security by design & by default.

SAGOM TUBI S.p.A. is committed to ensuring all the above for not only the company's own information (included personal data), but also that of its customers, employees and stakeholders in general, applying as a corporate culture, the principles of need-to-know, least privilege, risk-based thinking and privacy and security by design & by default.

A fronte di questo impegno e sulla base di tali principi, SAGOM TUBI S.p.A. ha implementato un Sistema di Gestione per la Sicurezza delle Informazioni e dei Dati Personali, quale meccanismo di controllo che, tramite misure organizzative, fisiche, tecnologiche e relative alla gestione del personale, permettono al Management di garantire che la sicurezza delle informazioni (compresi dati personali) sia il risultato di una gestione sostenibile piuttosto che quella di una mera coincidenza e di uno sforzo individuale.


As a result of this commitment and based on these principles, SAGOM TUBI S.p.A. has implemented an Information Security and Data Protection Management System as a control mechanism that, through organizational, physical, technological and personnel management measures, allow Management to ensure that information security (included personal data) is the result of sustainable management rather than that of mere coincidence and individual effort.

Infatti, SAGOM TUBI S.p.A. crede che la sicurezza raggiungibile solamente attraverso le misure tecniche è limitata e deve essere supportata da procedure di gestione della sicurezza delle informazioni adeguate, un monitoraggio costante del Sistema, orientato al rischio e sempre teso al miglioramento, oltreché formazione e sensibilizzare degli attori coinvolti.

In fact, SAGOM TUBI S.p.A. believes that security achievable only through technical measures is limited and must be supported by appropriate information security management procedures, constant monitoring of the System, risk-oriented and always striving for improvement, as well as training and raising awareness of those involved.

SAGOM TUBI S.p.A. è infatti consapevole che la sicurezza delle informazioni e dei dati personali è il risultato tangibile della partecipazione e impegno responsabile e competente di tutti: dipendenti, clienti e fornitori.


SAGOM TUBI S.p.A. is indeed aware that information security and data protection is the tangible result of the responsible and competent participation and commitment of everyone: employees, customers and suppliers.

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Gli obiettivi per la sicurezza delle informazioni e la protezione dei dati personali di SAGOM TUBI S.p.A. sono:


SAGOM TUBI's information security and data protection objectives are the following:

- Garantire riservatezza, integrità e disponibilità delle informazioni (di business e personali) proprie, dei propri dipendenti e clienti, assicurando che siano gestite in accordo con obblighi normativi – nazionali e internazionali -, contrattuali e degli standard cui l'azienda aderisce.
- Integrare i requisiti del sistema di gestione per la sicurezza delle informazioni e dei dati personali all'interno dei processi aziendali, mantenendo il sistema di gestione per la sicurezza delle informazioni sempre aggiornato, monitorato e teso al miglioramento continuo.
- Assegnare ruoli e responsabilità a personale qualificato e competente, privi di conflitti di interesse e subordinazione, al fine di delineare una chiara gestione della sicurezza delle informazioni e dei dati personali in termini di: governance, gestione degli incidenti inclusi i Data Breach, la gestione delle crisi e della business continuity.
- Essere recettivi dei rischi e opportunità del contesto esterno ed interno, per favorire una sempre aggiornata comprensione dei possibili impatti che possono ricadere sulle informazioni (compresi dati personali) gestite dall'azienda e favorire una pronta risposta.
- Formare e sensibilizzare i dipendenti sulla sicurezza delle informazioni e sulla protezione dei dati personali, sul sistema di gestione implementato e relative policy, procedure e regolamenti, sui rischi
- Ensure confidentiality, integrity and availability of its own information (business and personal) and that of its employees and customers, ensuring that it is managed in accordance with regulatory obligations – national and international –, contractual obligations and standards to which the company adheres.
- Integrate information security and data protection management system requirements within business processes, keeping the information security management system constantly updated, monitored and aimed at continuous improvement.
- Assign roles and responsibilities to qualified and competent personnel, free from conflicts of interest and subordination, in order to outline a clear management of information security and data protection in terms of: governance, incident management, including Data Breach, crisis management and business continuity.
- Be receptive to the risks and opportunities of the external and internal environment, to promote an up-to-date understanding of the possible impacts that may impact on the information (included personal data) managed by the company and to encourage a prompt response.
- Train and sensitize employees on information security and data protection, on the management system implemented and related policies, procedures and regulations, potential risks – increasingly frequent and complex – and ways to prevent them.

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potenziali – sempre più frequenti e complessi – e le modalità per prevenirli.

- Comunicare con le autorità competenti e le parti interessate gli eventi per la sicurezza delle informazioni e i dati personali che possono avere un impatto rilevante sugli stessi, secondo gli accordi contrattuali e le normative nazionali e internazionali, e conservare le registrazioni necessarie alla ricostruzione degli eventi e delle relative cause.
- Adottare idonee misure – fisiche e tecnologiche – di prevenzione, e predisporre piani di risposta per la gestione delle crisi, incidenti e data Breach o potenziali tali; garantendo misure idonee a preservare la continuità della sicurezza delle informazioni e dei dati personali.
- Assicurare che la sicurezza delle informazioni e dei dati personali sia mantenuta anche dalla propria catena di fornitura e dalle tecnologie che SAGOM TUBI S.p.A. utilizza, condividendo con i propri collaboratori gli standard di sicurezza che SAGOM TUBI S.p.A. si aspetta all'interno del rapporto di collaborazione e ripartendo in modo chiaro e trasparente le responsabilità delle parti per la sicurezza delle informazioni scambiate nel rapporto contrattuale di collaborazione, anche con riferimento alla normativa vigente.
- Prevenire la perdita del diritto d'autore tramite il monitoraggio dei software utilizzati, siano essi usufruibili online o su licenza, anche in considerazione dell'introduzione della intelligenza artificiale.
- Valutare il proprio sistema di gestione per la sicurezza delle informazioni e dei dati
- Communicate with relevant authorities and interested parties information security and personal data events that may have a major impact on them, according to contractual agreements and national and international regulations, maintaining records necessary for reconstruction of the events and their causes.
- Adopt appropriate – physical and technological – prevention measures and prepare response plans for managing crises, incidents and data breaches or potential ones, guarantee appropriate measures to preserve continuity of information security and personal data.
- Ensure that information and personal data security is maintained by the supply chain as well as the technologies that SAGOM TUBI S.p.A. uses, by sharing with its collaborators the security standards that SAGOM TUBI S.p.A. expects within the collaborative relationship and by clearly and transparently allocating the responsibilities of the parties for the security of the information exchanged in the collaborative contractual relationship, also with reference to the current legislation.
- Preventing the loss of copyright protection through the monitoring of the software in use, whether accessed online or under license, also in view of the introduction of artificial intelligence.
- Evaluate the information security and personal data management system including

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personali anche tramite organismi
indipendenti e qualificati.

through independent and qualified third-
party companies.

Data/ Date

23/01/2025

La Direzione / Management

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VALIDITA' / VALIDITY

Il presente documento aziendale è valido immediatamente dopo la pubblicazione.
This Company Document is valid immediately after publication.

La Politica della sicurezza delle Informazioni è verificata annualmente in sede di Riesame di Direzione.
The Information Security Policy is verified annually during the Management Review.



APPENDIX 2

Gender Equality Policy for SAG TUBI SpA.



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Company registration number RE – C.F. / P. IVA 01407790.



ISO 14001:2015
ISO 9001:2015
IATF 16949:2016
ISO 45001:2018

GENDER EQUALITY POLICY

THE PATHWAY TO GENDER EQUALITY

With the goal of best fulfilling its mission and in line with its strategic vision, SAG tubi SpA has decided to adopt a Gender Equality Management System (SGPG) compliant with UNI/PdR125:2022, as a valid tool to ensure gender equality in terms of the presence and professional growth of women, promoting an inclusive culture and the implementation of processes capable of developing female empowerment. For SAG Tubi SpA, achieving this certification will be just the first step in a broader process of implementing gender equality policies, with a view to improving and promoting gender equality. The certification aims to support and encourage the organization to adopt policies designed to reduce the gender gap, with consequent benefits for staff well-being, as well as reputational and ethical impacts.

THE INSPIRING PRINCIPLES

The fundamental principles underlying Sag Tubi's Gender Equality Policy are:

- IMPARTIALITY AND INCLUSIVITY
- FAIRNESS AND TRANSPARENCY
- PERSONNEL RECOGNITION
- PERSONAL PROTECTION
- COMBATING ALL FORMS OF VIOLENCE AND DISCRIMINATION

The attention with which SAG Tubi SpA focuses its efforts to ensure that its SGPG meets the requirements specified in UNI/PdR 125:2022 is inspired—in line with the 2020-2025 Gender Equality Strategy defined by the European Union—by the pursuit of the following objectives:

- increasing women's participation in the workforce;
- reducing the pay and pension gap between men and women, also to combat female poverty;
- promoting equality between men and women in decision-making;
- combating stereotypes and gender-based violence and protecting and supporting

THE COMMITMENT OF THE MANAGEMENT

To promote the achievement of the principles and objectives set out above, the management of SAG Tubi SpA considers it essential to continuously adopt the SGPG in order to develop an organizational model that promotes gender equality and values fairness and inclusiveness.

SAG Tubi SpA is committed to:

- adopting tools to prevent all forms of gender discrimination and to combat any act that undermines the dignity of staff, regardless of their role and level of responsibility;
- to value diversity in every business process: from the search and selection of human resources to access to training, from the definition of remuneration policies to performance evaluation and the allocation of reward systems, from the selection of suppliers to the provision of services/supply of products;



GENDER EQUALITY POLICY

- supporting the family welfare of its employees through working methods that promote a good work-life balance;
- promoting information, awareness, and engagement initiatives for staff on the issues of equal opportunities and female empowerment, avoiding stereotypes and promoting the visibility of women's contributions;
- promoting communication, including through marketing and advertising activities, that transparently declares the desire to achieve gender equality, value diversity, and support female empowerment.

SPECIFIC POLICIES ON GENDER EQUALITY

These following policies are more specific to gender equality that provide the necessary input for developing the Strategic Plan for Gender Equality and for identifying, developing, and implementing procedures specifically dedicated to gender equality, based on the organization's context.

The gender equality policies developed in line with our main policy relate to the themes of the Strategic Plan:

1. Recruitment
2. Career management
3. Pay equity
4. Parenting , caregiving
5. Work-life balance
6. Prevention of all forms of physical, verbal and digital abuse in the workplace

Specifically, the commitments undertaken by SAG Tubi SpA are:

1. **Recruitment:** *attracting talents in any field and for any job, so that there is the possibility of hiring women in a predominantly male sector;*
2. **Career management:** *providing equal career opportunities for both women and men;*
3. **Pay equity:** *ensuring equal pay for equal work without prejudice based on gender*
4. **Parenting, caregiving:** *Ensuring full compliance with the National Collective Labor Agreement (CCNL) on parenting and care;*
5. **Work-life balance:** *Facilitating work arrangements to pursue a balanced mix of work and personal life;*
6. **Prevention of all forms of physical, verbal and digital abuse in the workplace.**

POLICY MONITORING AND IMPLEMENTATION

The general policy on gender equality and related policies, within the broader framework of the organization's program guidelines, stipulates that the objectives on gender equality shall be defined and reviewed periodically in conjunction with the Gender Equality Steering Committee, in order to assess their suitability and the need for amendments or additions.



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GENDER EQUALITY POLICY

SHARING OF THE POLICY

The gender equality policy is communicated and disseminated to all staff and stakeholders through internal communication and publication on the institutional website.

Novellara, 13/06/25

Approved by the Steering Committee

The president

Raffaella Bandini





Revision	Description	Date
00	First issue	01/10/2025
01	Integration of commitments relating to health and safety at work and the environment	30/03/2026