

	Level	Permitted scope of diffusion
X	Public	The document can be disseminated <u>outside</u> the company
	Internal Use	Th document can be disseminated <u>only inside</u> the company. It is permitted to communicate it to third parties with a non-disclosure clause
	Riservated	The document <u>cannot be distributed within the company</u> . Its visibility is limited to a small group of people

COMPANY POLICY DOCUMENT

Tra.Ser's integrated policy for the management of aspects relating to Quality, Environment, Safety, Ethical-Social Responsibility, Road Traffic Safety, Information Security, prevention of corruption and operational continuity in line with the context of the strategic risks of its organization and complies with the legal and regulatory requirements in force and binding contractual agreements. **It is revised according to the acquisition of certification on the Guidelines of 5 November 2013 on good distribution practices of medicines for human use, as well as the activities necessary to ensure that the delivered product maintains its quality and integrity and remains within the supply chain legal pharmaceutical during storage and/or transportation. This highlights the efforts of the Tra.Ser srl company in pursuing the continuous search for the satisfaction of all customers and interested parties.**

The primary objectives established by the Management at all levels are as follows:

- *create value, sustainability and safety through the integration of professionalism, competence, knowledge, involvement and innovation;*
- *guarantee and preserve the satisfaction of all interested parties (customers, staff, suppliers, community);*
- *aim for continuity of the business and services offered.*

To implement these principles, the Management has adopted a strategy based on different lines of action, strongly integrated with each other and based on the requirements expressed by the regulations:

- ● ISO 9001: for Quality
- ● ISO 13485: for the quality of medical devices
- ● ISO 14001: for the environment
- ● ISO 45001: for Safety
- ● ISO 39001: for road traffic safety
- ● ISO 27001: for Information Security
- ● ISO 37001: for the Prevention of Corruption
- ● ISO 22301: for Business Continuity.
- ● SA8000: for ethical-social responsibility
- ● UNI PdR 125/2022 for Gender Equality
- ● Guideline of 5 November 2013 on good practices for the distribution of medicines for human use

The integrated management system, the Organisation, Management and Control Model and the Code of Ethics are the tools that the Management has defined to achieve its objectives.

The objectives that the Management has established and requires each employee to observe are:

- ◆ contribute to maintaining an effective Integrated Management System according to the requirements of the UNI EN ISO 9001, ISO 13485, UNI EN ISO 14001, ISO 45001, SA8000, ISO 39001, ISO 27001, ISO 37001, ISO 22301, UNI PdR 125/2022 standards, **GDP Guideline**
- ◆ define the criteria and implement a methodology for assessing the risks inherent to the critical aspects relating to its activities, thus determining the levels of acceptable risk and the intervention protocols, where necessary;
- ◆ monitor and control the organisation's processes, in order to evaluate their understanding within the company, guarantee the adequacy and continuous improvement of the Integrated System through the use of appropriate indicators and the definition of development objectives and goals;
- ◆ guarantee the satisfaction of the Customer's needs and requirements;
- ◆ guarantee compliance with current legal provisions and applicable requirements;



- ◆ guarantee functionality, reliability, transparency, ethics and integrity in one's conduct;
- ◆ increase the contribution of "technological innovation" by proposing new solutions both to its customers and within the Organization;
- ◆ aim for the "zero accidents" objective by implementing all the necessary measures in organizational, operational and technological terms to prevent accidents, injuries and occupational diseases;
- ◆ aim for the objective of "zero road accidents" by implementing all necessary measures in organizational, operational and training terms;
- ◆ spread the culture of safety in terms of prevention and protection so that it is considered an integral part of the work activity;
- ◆ prevent pollution, reduce energy consumption and improve waste production/management by adapting behaviour;
- ◆ minimize the environmental impact of its activities and the services offered to customers;
- ◆ guarantee secure access to information, in order to prevent unauthorized processing or processing carried out without the necessary rights.
- ◆ establish ethical values and transmit a socially responsible culture in the company;
- ◆ do not use, or support the use of, child labour, forced or compulsory labour;
- ◆ do not implement or support any form of discrimination;
- ◆ respect the national collective agreement applied, guaranteeing the protection of workers' rights and observing the provisions contained therein, both of an economic and regulatory nature.

The Company Management undertakes to adequately select its suppliers and ensure that they share and respect the commitments relating to legislative compliance regarding the environment, worker health and safety, ethical behaviour, social responsibility, confidentiality of information and prevention of corruption.

The Data Controller is

TraSer S.r.l., the registered office is located in Via di Portonaccio, 35 – 00159 Rome.

TraSer S.r.l. provides its employees, collaborators, suppliers or consultants with organizational and technical instructions that allow compliance with legal obligations relating to privacy.

For these obligations it outlines the security framework adopted for the information system and defines all the measures to guarantee the reliability of the hardware and software components for the purposes of protecting the personal data processed. Furthermore, it informs users of products and services of the measures implemented to protect and preserve personal data through the appropriate information.

This document is disseminated to all levels of the organization via short delivery, via company email, through publication on the website for all interested parties (internal-external) and is made available to all third parties involved in various capacities to company activities, in the management of information and components of the Information System.

In the event of violation of this policy and the implementing rules, the sanctions provided for by the applicable National Collective Agreement will be applied - as appropriate.

This company policy is subject to periodic review in the face of internal or external changes to the organization, with the aim of ensuring the validity, adequacy and effectiveness within the Integrated Management System and to promote commitment towards the continuous improvement. TRA.SER staff is committed at all levels to consciously pursue what is stated in this policy.

The staff can, if they deem it necessary, submit reports to the RINA certification body at the e-mail address SA8000@rina.org, to the SAAS accreditation body at the e-mail address saas@saasaccreditation.org and/or to the Social Accountability International at info@sa-intl.org.

Roma, 09/04/2024

La Direzione

ANTI-CORRUPTION POLICY

This corporate policy of the anti-corruption management system represents TraSer S.r.l.'s commitment to the principles and requirements established by the voluntary standard ISO 37001:2016 as well as compliance with the anti-corruption principles established by the Code of Ethics responding to the requirements established by the Legislative Decree 231/2001.

Tra.Ser is fully aware that the phenomenon of corruption represents an obstacle to the economic, political and social development of a country and a serious distortion of the rules, correctness and competitiveness of the markets.

In this sense, it has put in place a management system whose aim is to keep the corruption phenomenon under control through constant training of its workers and the involvement of business partners.

Definition of corruption

It constitutes corruption to offer, promise, give or accept a financial or other benefit to induce the person receiving it, or another individual, to improperly carry out their duties, or to give them a reward of any kind for having acted in an inappropriate manner. Inappropriate, or even when the person receiving the benefit behaves incorrectly by accepting the benefit. The benefit includes money, gifts, loans, honoraria, hospitality, services, discounts, the award of a contract or anything of value.

In application of this commitment, senior management has determined that the Organization's Prevention Policy is based on:

- Rigorous and full compliance with current legislation on the prevention and combating of corruption, with the involvement of employees, collaborators in any capacity, and all subjects who operate for and/or under the control of the organization;
- The absolute prohibition on engaging in behavior that could be considered as corruption or attempted corruption;
- Carrying out an accurate context analysis which led to the identification, within the activities carried out by the organisation, of the areas of potential danger and identification and implementation of actions suitable for reducing/minimising the risks themselves;
- Full commitment to comply with all the requirements of the management system for the prevention of corruption by all company stakeholders;
- Raising awareness and training of its employees on the issues of preventing corruption;
- The provision of methods for reporting suspicions in good faith, or on the basis of a reasonable belief, ensuring the anonymity of the reporters;
- The pursuit of any behavior that does not comply with the policy for the prevention of corruption with the application of the organization's sanctioning system;
- The designation of a compliance function for the prevention of corruption, which is guaranteed full authority and independence in the role.

Codes of conduct and sanctions

The principles and values defined by the Top Management are expressed in the following lines of conduct, which must be applied by all employees and collaborators and must be known by all stakeholders:

- any type of corruption in any form or manner is prohibited;
- it is forbidden to offer, promise or authorize any form of benefit, including gifts, gifts, hospitality, which could lead to receiving a commercial advantage or where behavior of this type could be perceived as a desire to influence a negotiation;
- it is forbidden to accept or request any form of benefit, including gifts, gifts, hospitality;
- it is forbidden to accept hospitality from a third party in excessively expensive places or situations;
- it is forbidden to make political contributions or accept any form of benefit from public officials;



- it is forbidden to pay preferential payments of any kind;
- in the case of extorted payments, reporting to the function responsible for the prevention of corruption is necessary;
- it is always necessary to avoid situations where the subjects involved are, or may even appear to be, in conflict of interest with Tra.Ser S.r.l.;
- it is prohibited to undertake any action that could be considered a violation of this policy.

Any behavior implemented in violation of this policy, as well as the requirements established by the Management System for the prevention of corruption, will be subject to sanctions.

The application of these sanctions is independent of the outcome of any criminal proceedings, since the rules of conduct imposed by the Management System are assumed by Tra.Ser S.R.L. in full autonomy and independence.

The corruption prevention policy is also available as documented information on the institutional website;

Furthermore, Tra.Ser S.r.l.:

- encourages the reporting of suspicious cases in good faith, guaranteeing the protection of the confidentiality of the reporter and ensures the absence of any form of retaliation against the person for the mere fact of having reported;
- is committed to the continuous improvement of corruption risk management and prevention processes;
- sanctions any form of failure to comply with the corruption prevention procedures and the contents of this company policy;

For this purpose, Tra.Ser S.r.l. gives full mandate to the Anti-Corruption Function, for the purpose of pursuing the objectives contained in this policy, by virtue of the authority and independence granted to it for:

- supervise the design and implementation of the Corruption Prevention Management System;
- provide guidance and advice to staff on corruption-related issues and the Corruption Prevention Management System;
- ensure that the Management System for the Prevention of Corruption complies with UNI ISO 37001:2016;
- report on the performance of the Management System for the Prevention of Corruption to Top Management in the most appropriate way.

Reports

Recipients are encouraged to report any violation of the Anti-Corruption System of which they have become aware, even indirectly, during the course of their activity and those reporting are guaranteed protection from any form of retaliation, discrimination or penalisation, without prejudice to legal obligations.

The report can be submitted in the following ways:

- a) by sending it to the email address **odv@traser.eu.com**. In this case, the identity of the reporting person will be known only by the OdV / FC, which will guarantee its confidentiality, except in cases where it is not enforceable by law.
- b) By postal service: **TraSer srl Via di Portonaccio, 35 00159 Rome** or by internal mail at the company; to guarantee confidentiality, the report must be placed in a closed envelope bearing the words "CONFIDENTIAL Supervisory Body / Compliance Function" on the outside;
- c) Verbally, by means of a statement issued to the FC and reported by it in the minutes.

The form for reporting crimes can be downloaded from the website.

Data 22/01/2025

La Direzione

BUSINESS CONTINUITY POLICY

With this document, the Management defines the guiding principles of the Business Continuity Policy that the organization intends to pursue. The purpose of this policy is to plan, establish, implement, monitor, review, maintain, and continuously improve a documented management system that enables the organization to prepare for, respond to, and recover from disruptive events.

Objectives of the Business Continuity Policy

The main objectives established by the Management are as follows:

1. **Operational resilience** Ensure the ability to deliver essential services even in the event of incidents, crises, or emergencies that could disrupt operations.
2. **Continuous improvement of services** Manage business processes with a focus on quality and stakeholder satisfaction.
3. **Consolidation of corporate reputation** Increase the number of clients, revenue, and market presence, expand into new areas, and improve the leadership position in the sector.
4. **Stakeholder satisfaction**
 - Achieve budget objectives.
 - Increase employment levels and promote salary adjustments.
 - Reduce absenteeism, employee disputes, and customer complaints.
 - Establish strong partnerships with suppliers.
5. **Human resource development** Enhance personal aptitudes and increase professional skills to improve efficiency and effectiveness in client service delivery.
6. **Reliability of business processes** Ensure full Business Continuity through the implementation and adherence to defined plans.
7. **Compliance with contractual commitments** Ensure the fulfillment of all explicit and implicit contractual obligations.
8. **Effective communication** Maintain clear and timely communication with clients and stakeholders during crises.
9. **Protection of human lives** Safeguard the safety and health of employees, clients, and other involved parties during a crisis.
10. **Minimization of business impacts** Ensure operational continuity and facilitate a rapid recovery of critical activities.
11. **Resilience of corporate architectures** Ensure that technological and organizational infrastructures are resilient and ready to face disruptions.

Principles of Business Continuity Management

To achieve the defined objectives, the Management pays particular attention to the following aspects:

- **Availability:** Implement mechanisms that ensure the accessibility and usability of services even in the event of a disaster.
- **Service level:** Guarantee the continuity of services in compliance with defined SLAs (Service Level Agreements).
- **Compliance:** Adhere to all applicable laws, regulations, and contractual obligations.

Measurable Objectives for Business Continuity

The Management establishes the following measurable operational objectives:

1. **Maximum Tolerable Period of Disruption (MTPD):** The maximum allowable time that a disruption in a service or activity can be tolerated before it has an intolerable impact.
2. **Recovery Time Objective (RTO):** The maximum period within which a service, product, or activity must be restored after an incident.



Commitment of the Management

In line with reference standards, the Management actively commits to:

- Implementing an effective and documented business continuity management system.
- Ensuring the maintenance and continuous improvement of the system.
- Periodically monitoring the policy to ensure it remains suitable and consistent with business objectives and market needs

Roma, 09/04/2024

La Direzione

INFORMAZION SECURITY POLICY

This policy aims to protect data and information from threats of all kinds, in order to ensure their integrity, confidentiality and availability, and provide the requirements for adopting an adequate Information Security Management System aimed at to correct management of the company's sensitive data.

The information security policy of TraSer S.r.l. applies to all internal staff and third parties who collaborate in the management of information and to all processes and resources involved in the field of application of the management system which is defined in the following field of application:

TRANSPORT, DIGITALIZATION AND STORAGE OF HEALTH AND NON-HEALTH DOCUMENTS.

Aware of the fact that its archiving activities for external parties may involve the entrusting of sensitive data and information, TraSer S.r.l. operates according to internationally recognized safety regulations.

On this line TraSer S.r.l. has decided to implement an Information Security Management System compliant with the requirements of the international standard ISO/IEC 27001.

In the specific field of Information Security issues, TraSer S.r.l. undertakes to carry out its activities according to the ISO/IEC 27001 standard through the following principles:

- a) Guarantee the organization full knowledge of the information managed and the assessment of its criticality, in order to facilitate the implementation of adequate levels of protection.
- b) Guarantee secure access to information, in order to prevent unauthorized processing or processing carried out without the necessary rights.
- c) Ensure that the organization and third parties collaborate in the processing of information by adopting procedures aimed at respecting adequate levels of security.
- d) Ensure that the organization and third parties who collaborate in the processing of information have full awareness of security issues.
- e) Ensure that anomalies and incidents having repercussions on the information system and corporate security levels are promptly recognized and correctly managed through efficient prevention, communication and reaction systems in order to minimize the impact on the business.
- f) Ensure that access to the offices and individual company premises occurs exclusively by authorized personnel, to guarantee the safety of the areas and assets present
- g) Ensure compliance with legal requirements and compliance with security commitments established in contracts with third parties.
- h) Prevent and manage information security events and/or incidents, collecting and maintaining the relevant records and improvement programs;
- i) Promote and implement targeted or widespread training and awareness plans on information security.

By corporate information security system, we mean *the set of technical and organizational measures aimed at ensuring the protection of the integrity, availability, confidentiality of automated information and the resources used to acquire, store, process and communicate such information.*

Information security can be characterized as the safeguarding of:

Confidentiality: it is the guarantee that a certain data is protected from improper access and is used exclusively by authorized parties. Confidential information must be protected both in the transmission phase and in the storage/preservation phase, so that the information is accessible only to those who are authorized to know it.



Integrity: it is the guarantee that all information is actually the one originally entered into the information system and that the data has possibly been modified exclusively in a legitimate and controlled manner. It must be guaranteed that the information is processed in such a way that it cannot be tampered with or modified by unauthorized parties or automatic systems, even as an element "unrelated" to a specific party.

Availability: it is the guarantee of availability of information according to the needs of continuity of the processes and in compliance with the rules that require their historical conservation.

The management and improvement of information security are part of a continuous process that must take into account multiple resistance factors, internal and external to the company, and which must constantly seek the best compromise between security and usability of the system.



Top Management has established the following objectives for Information Security:

- establish and implement an Information Security Management System based on the ISO/IEC 27001 standard;
- guarantee an appropriate level of information security within the life cycle of the services provided to its customers, through the identification, evaluation and treatment of the risks to which the services themselves are subject;
- ensure the continuity of company business processes and services provided to its customers;
- prevent information security incidents and minimize their impacts, safeguarding the interests of the company and other interested parties;
- ensure compliance with applicable mandatory legislation;
- increase the level of awareness and competence on information security issues among its staff;
- safeguard the company image perceived by customers as a reliable and competent supplier;
- identify improvement opportunities aimed at increasing the effectiveness and efficiency of the management system and its processes.

TraSer S.r.l. undertakes to continuously improve its policy and programs and to implement procedures, rules and instructions aimed at ensuring that the values expressed in this policy are reflected in the behavior of each Employee and Company Collaborator.

This policy is disseminated to all company figures and made public.

TraSer S.r.l. periodically checks through internal audits and during the Management Review that the company policy is understood, implemented and supported by all company units.

The Policy is evaluated at least once a year during the Review of the Integrated Management System based on the results achieved.

Politics is spread through:

- appropriate staff training;
- periodic meetings;
- company website.



The commitments contained in the Policy are commensurate with the human and financial resources available and are the reference for defining objectives for improving performance.

Roma, 09/04/2024

La Direzione

Gender Equality policy UNI/PdR 125/2022

*La parità di genere
è essere diversi
ma con lo stesso peso.*



The corporate management, taking into account the evolving context, formally commits to a policy on gender equality by defining principles, objectives, and guidelines that outline the organization's approach to gender equality, valuing diversity, and supporting female empowerment.

TRASER srl is a company made of people; for this reason, it has decided to adopt this Gender Equality Policy aimed at promoting and safeguarding diversity and equal opportunities in the workplace.

TRASER recognizes gender equality as an essential element of civility, a cornerstone of universal human rights, and a strategic factor for creating value and fostering the company's growth.

TRASER srl is aware that its organization, processes, and activities must be based on respect and protection of working conditions and workers' rights.

To ensure continuous improvement in its performance on Gender Equality, following the guidelines of UNI/PdR 125:2022, TRASER srl commits to consistently pursuing the following objectives at its headquarters and temporary sites:

- ★ Promoting a safe working environment where gender equality is considered an added value.
- ★ Ensuring equal recognition for employees performing the same work, rejecting any form of gender discrimination.
- ★ Guaranteeing safe workplaces to foster the participation and full potential of all employees while taking action against inappropriate behaviors, including harassment, intimidation, threats, coercion, and abuse.
- ★ Encouraging suppliers and subcontractors to adopt practices that promote diversity and inclusion.
- ★ Complying with all applicable gender equality regulations.
- ★ Encouraging anyone who feels they have experienced discrimination to report it, ensuring appropriate investigation procedures while protecting the identities of those involved.
- ★ Ensuring continuous improvement of this policy through immediate corrective actions in case of violations.

Management also commits to defining a strategic plan by implementing a management model that ensures the sustained fulfillment of the defined and enacted requirements, measuring progress through specific Key Performance Indicators (KPIs) documented in the management system.

TRASER srl establishes and maintains an internal and external communication plan to provide adequate and continuous information about the results achieved through its Gender Equality Management System.

Management periodically reviews the effectiveness of the policy and the Gender Equality Management System, assessing opportunities for improvement and setting new goals to enhance company performance.



Management also commits to defining a strategic plan by implementing a management model that ensures the sustained fulfilment of the defined and enacted requirements, measuring progress through specific Key Performance Indicators (KPIs) documented in the management system.

TRASER srl establishes and maintains an internal and external communication plan to provide adequate and continuous information about the results achieved through its Gender Equality Management System.

- No form of discrimination may be implemented or tolerated at any stage of an employee's work journey, from initial selection to the highest career levels, including everyday work routines.
- Fostering a culture of inclusion through information and training initiatives.
- Supporting and valuing maternity/parenthood at all stages.
- Aligning all internal and external communications with the values of gender equality.
- Requiring balanced representation of men and women as speakers in panel discussions, events, and conferences (when applicable).
- Taking all necessary preventive actions to ensure no form of physical, verbal, or digital abuse occurs in the workplace.
- Communicating and disseminating the Gender Equality Policy and its updates within the company and making it available on the corporate website.
- Allocating the necessary budget to achieve and maintain the goals of this plan.
- Appointing a Steering Committee (SC) to ensure the effective adoption and implementation of the Gender Equality Plan (GEP).

It is important to highlight that TRASER srl has held SA 8000 certification since 2005, demonstrating its genuine commitment to combating discrimination.

This policy integrates with other Corporate Policies on Quality, Safety, Environment, Social Responsibility, Road Safety, Information Security, Business Continuity, and Anti-Corruption.

All personnel are required to comply with the management system in their respective areas of responsibility and to apply the principles outlined in this Gender Equality Policy in their daily activities.

Employees may submit written reports, including anonymous ones, regarding harmful behaviors, abuse, threats, or violence by placing them in the Suggestions/Complaints Box available at every company location or by emailing the Steering Committee: robertascafariello@traser.eu.com

Roma, 09/04/2024

La Direzione

