

## MINIMUM SUSTAINABILITY REQUIREMENTS

EXA.Group aspires to be a sustainable organisation that while working on its projects remains committed to protecting the environment and to achieving environmental and social benefits in the communities in which it operates. To achieve these goals, EXA.Group asks its suppliers to pursue and comply with the ESG (Environmental, Social and Governance) requirements and objectives set out within this document.

In drawing up the following sustainability guidelines, EXA.Group was inspired by the principles and objectives of the main international references in this field:



Pic. 1 – The UN's 17 Sustainable Development Goals (SDGs) are the roadmap for achieving a better and more sustainable world for all by 2030. These goals are a call to action to address a number of global challenges, such as poverty, inequality, climate, environmental degradation and justice.



International  
Labour  
Organization

Pic. 2 – The International Labour Organisation (ILO) promotes social justice and internationally recognized human and labour rights, pursuing its founding mission according to which social justice is essential for universal and lasting peace.



United Nations  
Global Compact

Pic. 3 – The Human Rights Council consists of 47 representatives of different states and is mandated to strengthen the promotion and protection of human rights worldwide by addressing human rights violations and making recommendations.



UNITED NATIONS  
HUMAN RIGHTS

Pic. 4 – The UN Global Compact supports companies to conduct their business in a responsible manner by aligning their strategies and operations with its 10 core principles, relating to: human rights, labour, environment and anti-corruption.

The requirements listed hereafter, divided by topic, are grouped in two categories:

1. **Mandatory:** they represent the minimum level of sustainability action, to which all recipients of this document must adhere.
2. **Strongly recommended:** guidelines for suppliers who choose to go beyond the minimum level.

## TRANSPARENT GOVERNANCE

### Mandatory

- Operating in full compliance with all the laws, regulations, standards and requirements of the states in which the supplier operates.
- Conducting operations with integrity and in an honest, fair and professional manner.
- Prohibiting any form of corruption, extortion or embezzlement.
- Conducting business in compliance with the principles of fair competition and relevant antitrust laws, committing to establish policies aimed at fostering fair and equitable competition among suppliers.
- Being available for external audits by EXA.Group, or by third parties acting for EXA.Group, conducted to verify compliance with the requirements of this document and their practical application.

### Strongly recommended

- Developing monitoring procedures to verify compliance with legal obligations and any other relevant requirements.
- Creating procedures and mechanisms to receive reports from all stakeholders (employees, clients, local community, etc.).
- Implementing mechanisms (whistleblowing) that allow workers to openly communicate and interact with Management to report problems or illegal activities in the workplace, while ensuring their identity and safety are respected.

## DATA PROTECTION, PRIVACY, CONFIDENTIALITY AND IT SECURITY

### Mandatory

- Using reasonable safeguards to protect confidential information from: loss, theft, destruction, unauthorised access, alteration, and unauthorised disclosure.
- If applicable, developing a policy/procedure for GDPR (General Data Protection Regulation) compliance.
- Informing and cooperating with EXA.Group with regard to any data breaches or incidents that might impact EXA.Group's confidential information.

### Strongly recommended

- Training and informing employees to raise awareness of IT security.

## WORKING CONDITIONS AND HUMAN RIGHTS

### Mandatory

- Promoting an inclusive work environment, free from discrimination, harassment, bullying and other unlawful behaviour.

- Avoiding using any form of child, forced or involuntary labour and physically punishing employees.
- Taking all reasonable measures to procure labour, products, services and materials from sources that do not use modern slavery.
- Treating all employees and persons involved in the business with full dignity and respect.
- Ensuring that all employees employed to perform work tasks (directly or through recruitment agencies) have all the work permits and visas required by law.
- Respecting the right of workers to freely choose to associate or join trade unions, be represented, and join workers' councils.
- Guaranteeing workers, in addition to breaks during the day, at least one day off per week.

## **Strongly recommended**

- Where the law restricts it, encouraging and facilitating workers to consider alternative forms of free association.
- Encouraging open communication with workers and informing them about their rights and responsibilities.
- Surveying the level of satisfaction of workers to identify strategies aimed at improving the overall working conditions.
- Introducing corporate welfare measures (e.g., company bicycles, dedicated break rooms).
- Allowing flexible working hours and the possibility of smart working, if applicable.

## **DIVERSITY AND INCLUSION**

### **Mandatory**

- Condemning and prohibiting any form of discrimination against any person, inside or outside the Group, based on race, nationality, language, sex, age, disability, state of health, sexual orientation, physical appearance or psychological state, political or trade union opinions, socio-economic status, personal conditions, maternity or paternity status, type of employment contract, philosophical views or religious beliefs.
- Ensuring fairness and diversity when searching for personnel, using different channels for posting job advertisements, as well as the use of inclusive expressions and images (e.g., use of neutral pronouns).
- Ensuring fair and equal pay for equal professional experience and skills in terms of salaries and benefits.

### **Strongly recommended**

- Cooperating with associations, specialised agencies and job centres with a view to socially integrate candidates, including but not limited to the physically disabled, the over 50s and/or people returning to the labour force after a long absence.
- Supporting inclusion and diversity policies and practices aimed at empowering all people belonging to disadvantaged groups or groups at risk of marginalisation, also strengthening their presence among the workforce.
- Planning training activities to raise awareness of the principles of diversity and inclusion among employees, and fostering understanding of the benefits of having a wide range of diverse perspectives, skills, values and beliefs within the organisation.

## HEALTH AND SAFETY AT WORK

### Mandatory

- Guaranteeing a safe and healthy physical, psychological, and social working environment by protecting workers from physically hazardous tasks in all workplaces.
- Reporting or stopping any activity considered, or that could become, dangerous.
- Developing training programmes for all workers on health, safety, and possible emergency situations.
- Carrying out an appropriate workplace risk assessment and health surveillance.
- Forbidding workers to perform work when their performance is impaired by the use of drugs (legal or illegal), alcohol or other substances.
- Carrying out all the periodic checks and maintenance on machines, equipment and installations as required by current legislation and operation & maintenance manuals.

### Strongly recommended

- Implementing a Health & Safety Management System certified according to the UNI ISO 45001 standard.
- Performing a “Root Cause Analysis” of accidents and near misses.
- Sponsoring programmes and initiatives that promote workers' health (e.g., healthy eating programmes) also outside the workplace.
- Organising training sessions on specific risks in the field of health & safety at work, in addition to the training activities required by law.

## PRODUCTS AND MATERIALS

### Mandatory

- Ensuring that all products and materials used at EXA.Group's sites meet all applicable laws and standards and comply with the manufacturers' testing and installation specifications.
- Providing, upon reasonable request, proof of all required certifications and traceability of the products used.
- Being willing to accept audits aimed at controlling the quality of the products/services provided to EXA.Group and of any production processes.
- Ensuring that products used on EXA.Group's sites are not substituted without the relevant approvals, meet specific quality requirements, and minimise the risk of non-compliant works.

### Strongly recommended

- Monitoring and reporting the use of products containing conflict minerals (e.g., tantalum, tungsten, gold), and trying to verify sourcing from legitimate, conflict-free mines.
- Where possible, use recycled wood or wood from FSC-certified sources. If non-FSC wood is used, ensure that it comes from a certified forest in full compliance with all legal requirements (e.g., PEFC, CERFOR, CEFLOR, CSA, etc.).
- Whenever possible, buy biodegradable, recyclable, or reusable materials.

- Reducing/eliminating the use of plastics in the packaging of products and the use of disposable plastics on premises and construction sites.
- Limiting the use of non-renewable resources such as oil, coal, rare-earth minerals and dwindling natural resources as much as possible.

## ENVIRONMENTAL COMPLIANCE

### Mandatory

- Operating in full compliance with the applicable environmental legislation of the states in which the supplier operates.
- Implementing appropriate control measures to comply with any environmental regulatory updates.
- Obtaining and maintaining environmental permits and submitting mandatory reports in a timely manner.

### Strongly recommended

- Implementing an Environmental Management System certified according to UNI ISO 14001.
- Providing environmental training to employees.
- Setting up auditing processes (internal and external) to verify the safety of processes. In the event of risks to the local communities and their environment, liaising with the local authorities and community to respond effectively to emergencies.

## ENERGY EFFICIENCY AND EMISSIONS

### Mandatory

- Monitoring, analysing and reducing energy consumption as far as possible.
- Progressively reducing the use of energy from non-renewable sources, preferring to purchase energy from certified renewable sources or self-generation (e.g., installation of a photovoltaic system).
- Managing the atmospheric emissions resulting from production processes according to the environmental regulations in force in the country of operation.
- Cooperating with EXA.Group to measure the energy consumption and emissions of the products/services provided.

### Strongly recommended

- Calculating direct and indirect greenhouse gas (GHG) emissions (scopes 1, 2 and 3) and drawing up a plan to reduce them.
- Adopting guidelines for a low-emission corporate mobility policy and gradually introducing low-emission vehicles.
- Developing procedures to prevent/reduce harmful emissions of chemicals during production-related processes.

## WASTE MANAGEMENT

### Mandatory

- Reducing waste production as much as possible and managing it through an effective waste separation system;
- Ensuring the proper management, metering and treatment of all types of wastewater, with emphasis on the use phases related to the emission of waters that could have adverse effects on human health or the environment.

### Strongly recommended

- Seeking alternatives to landfill of waste, by actively searching for reliable partners that ensure waste recovery and recycling.
- Raising awareness and training employees for proper waste management.
- Developing a waste management policy that focuses on prevention, source reduction, recycling, and material recovery, with disposal as a last resort.

SUPPLIER: \_\_\_\_\_

SIGNED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

Giuseppe Polvani  
Founder and CEO

