Quality and Environmental Policy

Public



QUALITY AND ENVIRONMENTAL POLICY

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1. Introduction

The purpose of this *Quality and Environmental Policy* ("Policy") is to state the commitment of OverIT S.p.A. and of the companies subject to its management and supervision ("OverIT") to the consistent pursuit of the highest possible quality standards, the protection of the environment, and the reduction of their environmental impact.

In support and guidance of this commitment, OverIT has resolved to adopt an Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity ("IMS") to serve as a benchmark and underpinning any further activities aimed at consistent improvement.

A distinctive attribute of this IMS is the integration, to the greatest possible extent, of Quality and Environment systems compliant with the requirements of UNI EN ISO 9001 and UNI EN ISO 14001, with those of Social Responsibility and Equal Opportunity in accordance with the requirements of SA 8000 and UNI/PdR 125.

The Policy is aligned with the four corporate values advocated by OverIT:

- **Trust** - Nothing is more important than the reliability and security of our systems.
- **Customer Success** - We only grow if our customers grow.
- **Excellence** - Every team and individual strives to be the best at what they do.
- **Simplicity** - Simplification and optimization are key.

This Policy is available for consultation both to internal users on the corporate intranet (at overme.overit.it) and to external ones on the official website, or upon request from the stakeholders. The Policy forms Annex 1 to the *Integrated Management System Manual for Quality, Environment, Social Responsibility and Equal Opportunity*, which is available to internal users on the corporate intranet. This Policy is subject to the relevant audits conducted during Management Reviews, and is updated accordingly, if so required.

2. Terms and definitions

Decarbonization plan: a strategic program through which OverIT identifies, plans, and implements the actions necessary to achieve measurable and progressive reductions in its direct and indirect greenhouse gas emissions, in accordance with the Paris Agreement.

Environment: the context in which an organization operates, which includes air, water, land, natural resources, flora, fauna, human beings and their interrelationships.

Company: OverIT S.p.A. and companies subject to its management and control. Hereinafter, also referred to as "OverIT," "Organization," or "Company."

General Management or **Management:** an individual or group of individuals who lead and control an organization at the highest levels, which OverIT identifies in the function of Chief Executive Officer.

Integrated Management System Manual: document providing guidelines and core support to the entire Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity.

Integrated Management System or **IMS**: part of an organization's management system that is used to manage environmental matters, fulfill compliance obligations, and address risks and opportunities (the distinctive features of OverIT's IMS were detailed in Chapter 1).

Management Review: analysis conducted at regular intervals by the General Management to assess performance against the objectives set and to verify the consistency and effectiveness of the Management System implemented.

Organization, Management and Control Framework (i.e. "OMC Framework"): set of protocols that regulate and outline the corporate framework and the management of its sensitive processes. If properly developed, adopted, updated, and enforced, it is a tool that reduces the risk of committing criminal offenses.

Quality: extent to which a set of the intrinsic attributes of an object meets the requirements.

RENTRI: Italian National Electronic Register for Waste Traceability, a digital system established to monitor and ensure the traceability of waste through the electronic management of environmental compliance requirements provided for by the applicable legislation.

Science Based Target initiative or **SBTi**: an initiative founded by the Carbon Disclosure Project (CDP), the United Nations Global Compact, the World Resources Institute (WRI), and WWF, which defines and promotes best practices for setting corporate greenhouse gas (GHG) emission reduction targets.

WEEE: Waste Electrical and Electronic Equipment, i.e. waste deriving from electrical or electronic equipment that has reached the end of its life cycle, to be managed in accordance with the methods set out by the applicable legislation, taking into account its specific characteristics and components.

3. Scope of application

This Policy applies to all companies and all/all employees within the Organization, who must adhere to its principles at all times and in all circumstances, in addition to current regulations.

All employees sign an acknowledgment of the Code of Ethics, this Policy and other key documents relevant to business process management upon onboarding.

4. Roles and responsibilities

Without prejudice to the specific responsibilities of the General Management, as outlined in Chapter 5 - Leadership of the *Integrated Management System Manual*, the function of Chief Executive Officer appoints an Integrated Management System Manager (hereinafter "IMSM") who is responsible for the operative management and shall authorize the actual implementation, document management, and effectiveness control of the IMS. OverIT identifies the role of the IMSM in the function of Sustainability Manager.

5. General principles

The approach adopted by OverIT in the management of Quality and Environment focuses on meeting the needs and expectations of all stakeholders, and is specifically addressed to the protection of the environment and the well-being of the communities involved. This not only entails that OverIT must comply with current

legislation (including environmental regulations), but that it is committed to minimizing the impacts its operations may have on the environment. While acknowledging the moderate environmental impact caused by a service company, OverIT identifies the following work and improvement areas:

- energy consumption;
- generation of CO2e emissions associated with the displacements of the corporate fleet;
- management of municipal and specific waste (toner, WEEE - Waste Electrical and Electronic Equipment) at the OverIT's premises.

Furthermore, while OverIT has no significant impact on the consumption of water resources, it also adopts use practices aimed at water conservation.

6. OverIT's commitments

6.1. Quality

OverIT is committed to ensuring high quality standards by leveraging its technical expertise, defining improvement objectives, and maintaining steadfast commitment to customer satisfaction and regulatory compliance. This commitment is realized through continuous performance monitoring and the proactive management of risks and opportunities related to business processes. Each year, through internal and external audits associated with our Integrated Management System certifications, the Company leverages findings to create concrete opportunities for improvement, further strengthening the overall effectiveness of the system.

6.2. Environment

Furthermore, the Company adopts a systematic approach to environmental protection, which includes assessing the environmental impacts of its operations and new solutions, managing energy consumption responsibly, and promoting sustainable behavior among employees.

With the aim of achieving continuous improvement in environmental performance and managing and reducing the impact of business operations on the surrounding environment, the Company is committed to complying with all applicable environmental laws across all administrative levels and production sectors.

6.2.1. Decarbonization plan

In accordance with the decarbonization plan developed under the Science Based Targets initiative (SBTi) criteria, OverIT commits to a 59% reduction in Scope 1 and Scope 2 greenhouse gas emissions by 2034, compared to the 2024 carbon footprint baseline. This target is set in alignment with the Paris Agreement and aims to contribute to limiting global temperature rise to 1.5°C. The planned actions are progressive and measurable, including:

- sourcing 100% renewable energy for all sites located in Italy by 2028;
- converting the corporate fleet to fully electric or hybrid vehicles, alongside increasing the electric-mode usage of plug-in hybrids to 80% of total mileage;

- improving office energy efficiency and rationalizing consumption through both technical and operational interventions.

6.2.2. Facility management

Throughout the entire process for identifying the location of new potential corporate premises, OverIT commits to:

- determining administrative compliance through the implementation of due diligence;
- preferring, where possible, locations that adopt energy efficiency protocols (e.g., availability of recognized certifications, presence detection devices to reduce unnecessary lighting, etc.);
- sharing this Policy with the properties of the different locations for acknowledgement, to promote a widespread culture of environmental protection.

6.2.3. Energy consumption

Regarding air conditioning and heating systems, the Company is committed to maintaining office temperatures in accordance with local regulations—typically ensuring a threshold no lower than 24°C in summer and no higher than 21°C in winter. These control strategies are implemented with careful consideration for the specific characteristics of each location to ensure effective temperature monitoring. To further optimize energy use, systems are deactivated or reduced during nights, weekends, and holidays. Furthermore, OverIT encourages the adoption of virtuous habits, such as ensuring all lights and electrical equipment are switched off at the end of the workday. These sustainable practices are promoted not only within our offices but also across our remote and agile working environments.

6.2.4. Home-work commute

With regard to home-work commutes, OverIT implements the Location Flexible Policy that offers all employees the highest flexibility standards in working from remote locations. In the event of employees commuting to corporate offices, OverIT encourages the use of public transportation and/or the adoption of environmentally friendly alternatives (e.g., biking, car-sharing, etc.).

6.2.5. Waste Management

OverIT implements a structured and well-established procedure for the management of both municipal and special waste, ensuring proper waste sorting across all sites while raising employee awareness regarding the importance of responsible disposal. Furthermore, the Company takes proactive measures to discourage the use of single-use plastics by providing refillable water bottles and installing water dispensers throughout its offices.

With regard to electronic equipment, OverIT manages the proper disposal of Company-owned PCs that have reached the end of their useful life or are no longer usable, treating them as WEEE in compliance with applicable requirements and through authorized providers.

Finally, OverIT ensures full regulatory compliance with Italian law, including registration with the National Electronic Register for Waste Traceability (RENTRI), and is committed to the proper disposal of WEEE at least once a year through 2030.

7. References

7.1. Internal references

This Policy is related to other documents that form part of the *Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity*, which are listed below.

Reference	Description
Code of Ethics	Comprehensive collection of principles and guidelines that define the values, conduct standards and moral expectations that guide activities and relationships within OverIT and drafted in accordance with the provisions of Legislative Decree 231/2001.
Integrated Management System Manual	Central guidance and support of OverIT's entire Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity.
Location Flexible Policy	Policy providing the highest flexibility standards when working remotely for all OverIT employees.
Environmental Assessment Procedure	Operating procedure that establishes the method and criteria the company adopts to assess the environmental impact of its activities, in accordance with the provisions of the UNI EN ISO 14001 standard.
Waste management Procedure	Operating procedure that outlines the systematic approach implemented for the proper management and disposal of waste within the organization, in accordance with the provisions of UNI EN ISO 14001.
Environmental Emergency Procedure	Operating procedure that establishes the actions to undertake when an exceptional event occurs that could result in adverse environmental impacts, in order to mitigate potential risks and minimize damage, in accordance with the provisions of UNI EN ISO 14001.

7.2. Relevant Legislation

This Policy complies with the contents of the following relevant legislation.

Reference	Description
UNI EN ISO 9001	ISO reference standard for quality management systems.
UNI EN ISO 14001	ISO reference standard for environmental management systems.
Legislative Decree 231/2001	Rules and regulations governing the administrative liability of legal persons, companies and associations, including those without legal status, pursuant to Legislative Decree 231 of 2001.

Document approval details

	Role	Name	Signature
Approved by	Chief Executive Officer	Pierpaolo Bergamo	Signatures have been executed in the Italian version of this document.

Review history

Version	Date	Major amendments
1.0	October 25, 2023	First draft of the *Quality and Environmental Policy*
2.0	December 20, 2025	Integration of quantitative CO_{2eq} emission reduction targets into our corporate policy, aligned with the Science Based Target initiative (SBTi).
2.1	October 20, 2026	Updated the Waste Management section and integrated information regarding the acknowledgement of this Policy by each employee upon joining the company.


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