

Ethics, integrity, excellence in products and services, occupational health and safety, environmental protection, inclusion, diversity and equity, information security and sustainable purchasing are the core 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 achieved through the use of organizational tools for the management of quality, environment, health and safety, gender equality, information security and sustainable purchasing.

The signing of this Integrated Policy document constitutes the commitment to fully implement it and make it available to all involved parties. The companies within the SAG Group are committed to opposing, through all available means, any conduct that conflicts with the guiding principles of this Policy, and to updating its content in accordance with regulatory changes and corporate strategy.

The CEO of SAG GROUP appoints the Management Systems Manager with the responsibility and necessary authority 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 authorities, and specific customer requirements are observed, all in accordance with ethical integrity and professional correctness;
- The Management System extends to third parties, particularly to suppliers of products and services;
- A Management Review is conducted at least once a year to analyze the results of the management system and individual processes, assess the effectiveness of action plans, and assign new targets;
- Staff is informed about the results achieved, changes made to the Management System, and opportunities for improvement currently under consideration;
- This document is displayed in company premises and published on the website to ensure transparency and accessibility to all stakeholders and to serve as a reference for the implementation of continuous improvement and company growth.

PRODUCT AND SERVICE QUALITY

The excellence of our products, supported by an outstanding level of service, is oriented towards the satisfaction of our customers and all stakeholders.

The key tool for achieving this goal is the Quality Management System, implemented 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 working language and method, while preserving the specific characteristics of each company, enabling the sharing of solutions, experiences and resources, and allowing the Group to present itself to customers as a coherent entity.

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;
- Promote cooperation among the company's various resources, in particular through consultation with and participation of employees, including 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 their own sites and throughout 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 ensure the protection of individuals with regard to their personal data, committing 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:

- Ensure 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

The SAG Group acknowledges that gender equality, fairness, inclusivity, and the promotion of diversity are the fundamental principles for the Group's sustainable development and for creating respectful, inclusive work environments focused on people's growth.

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In line with its values and its Gender Equality Management System, which complies with UNI/PdR 125:2022, the SAG Group is committed to promoting equal opportunities for women and men and to preventing all forms of discrimination, harassment, abuse, or behaviour that damages personal dignity, regardless of role, position, or level of responsibility.

The SAG Group works to ensure that the principles of impartiality, fairness, transparency, and the recognition of skills are applied in all key business processes, from recruitment and hiring to career management and development, from training to performance evaluation, and from compensation and incentive policies to the management of organizational changes.

The SAG Group promotes equal access to professional and growth opportunities, striving for pay equity and combating gender stereotypes and biases, with a particular focus on recognizing and valuing women's contributions, even in contexts and roles traditionally dominated by men.

The SAG Group additionally supports parenting and caregiving by encouraging, where compatible with organizational and production needs, work arrangements that help employees balance their professional and personal lives, and by promoting a work environment that prioritizes employees' well-being.

SAG Group is committed to spreading a culture based on respect, collaboration, and inclusion through information, awareness-raising, and training initiatives on gender equality, equal opportunity, and the prevention of all forms of discrimination and harassment, including physical, verbal, and digital harassment.

These principles are also promoted in the Group's relationships with stakeholders as well as in its internal and external communications.

Management ensures the upkeep and continuous improvement of the Gender Equality Management System by defining and monitoring objectives, indicators, and actions consistent with the Group's context, necessities, and strategic directions, through the involvement of the relevant departments and the Gender Equality Guidance Committee.

SUSTAINABLE PURCHASING

The SAG Group acknowledges the importance of environmental, social, and economic sustainability within its supply chain and integrates the principles of the 2030 Agenda into its decision-making processes, with the goal of generating long-lasting value for customers, suppliers, people, communities, and the environment. This Policy defines the SAG Group's commitments to the responsible procurement of goods, services, materials, and work intended for the Group's industrial activities. The objective is to direct purchasing decisions toward an ethical, transparent, innovative, and resilient supply chain by integrating environmental, social, and economic criteria alongside quality, operational continuity, compliance, and cost. This Policy applies to the purchase of components, materials, services, and work, as well as to relationships with suppliers, contractors, and business partners, based on criteria proportionate to the type, significance, and risk of the goods or services being procured.

Environmental Responsibility: SAG Group carries out its procurement activities in compliance with applicable regulations and promotes structured environmental management practices among its suppliers. Specifically, it is committed to:

- giving preference to suppliers with certified environmental management systems (e.g., ISO 14001 or EMAS) or those able to provide objective evidence of effective environmental practices;
- favour, where technically and economically applicable, materials and components that reduce life-cycle impacts, including through recycled content, recyclability, and resource efficiency;
- promote the reduction of greenhouse gas emissions in procurement, transportation, and production activities;
- encourage the use of renewable energy, clean technologies, and circular economy solutions in production processes.

Social Responsibility: SAG Group acknowledges the dignity of the individual, human rights, and dignified work as essential principles of its supply chain. The Group is committed to:

- collaborating with suppliers who respect fundamental human rights, labour laws, and equal treatment and opportunities;
- not intentionally establish or maintain business relationships with parties involved in child labour, forced labour, human trafficking, or discriminatory practices;
- promote occupational health and safety throughout the supply chain, also referencing the principles of ISO 45001;
- promote, when compatible with the technical and market requirements, local economic development, SMEs, and socially responsible businesses.

Economic Responsibility, Integrity, and Innovation: In its purchasing decisions, SAG Group is committed to:

- considering, in addition to price, quality, supply continuity, ESG risks, and, where applicable, life-cycle costs;
- promote transparent, fair, and ethical relationships in the selection, negotiation, and management of suppliers;
- favour partnerships with suppliers focused on innovation, digitalization, and the development of solutions with a lower environmental impact;
- support research and development initiatives consistent with the circular economy, resource efficiency, and emissions reduction.

When applicable to the product type, the economic operator's role, and the target market, the materials and components supplied to SAG Group must comply with the relevant regulatory and contractual requirements, including, but not limited to:

- Regulation (EC) No. 1907/2006 (REACH), including the relevant obligations regarding SVHC candidate substances;
- Regulation (EU) 2017/821 on minerals originating from conflict-affected or high-risk areas;
- applicable regulations regarding PFAS, depending on the product and the target destination market;
- Directive 2011/65/EU (RoHS), as subsequently updated, where applicable;
- additional material compliance requirements required by regulations or by the customer's contractual specifications.

SAG Group may request that suppliers provide declarations, technical data, and internationally recognized standard templates, such as CMRT, EMRT, and AMRT, to gather information on the origin and supply chain of relevant minerals and metals. In the event of incomplete information or significant noncompliance, the Group may request clarifications, additional evidence, and corrective actions that are proportionate to the risk.

To implement this Policy, SAG Group is committed to:

- integrating environmental, social, and ethical criteria into the processes of qualification, selection, and evaluation of suppliers;
- providing periodic training to personnel involved in procurement on the topics of sustainability and responsible sourcing;
- assess and monitor ESG performance, using methods proportionate to the risk and significance of the supplier, including through self-assessment questionnaires and requests for documentation;
- promote the traceability and transparency of raw materials where applicable, with particular attention to critical substances and materials;

- collaborate with suppliers to set realistic and measurable improvement actions that are consistent with the identified issues.

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 behaviour 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

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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 constitutes a role of absolute strategic importance and represent an important business asset to 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 with respect to the purposes of the processing;

- accuracy and updating of the data, including the timely deletion of data that are inaccurate with respect 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.

Indeed, SAGOM TUBI S.p.A. is 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:

The information security and data protection objectives of SAGOM TUBI S.p.A. are:

- 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.
- Integrire 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 -, gestione della 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 always update, 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.
- To be receptive to the risks and opportunities of the external and internal environment, to foster an up-to-date understanding of the possible impacts that may fall 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 posso 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 also maintained by its supply chain and 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 by monitoring the software used, whether usable online or under license, also in view of the introduction of artificial intelligence.
- Evaluate its information security and personal data management system including

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Data/ Date

23/01/2025

La Direzione / Management

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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

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

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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;
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- 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 with respect to the purposes of the processing;

- accuracy and updating of the data, including the timely deletion of data that are inaccurate with respect 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.

Indeed, Sagom Rubber S.r.l. is 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:

The information security and data protection objectives of Sagom Rubber S.r.l. are:

- 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.
- Integre 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 -, gestione della 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 always update, 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.
- To be receptive to the risks and opportunities of the external and internal environment, to foster an up-to-date understanding of the possible impacts that may fall 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 posso 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 also maintained by its supply chain and 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 by monitoring the software used, whether usable online or under license, also in view of the introduction of artificial intelligence.
- Evaluate its information security and personal data management system including

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personali anche tramite organismi
indipendenti e qualificati.

through independent and qualified
organisms.

Data/ Date

10/10/2025

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.

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
02	Update to the commitments related to gender equality. Addition of commitments related to sustainable procurement.	23/09/2026