

	level	Scope of diffusion allowed
X	Public	The document can be disseminated outside the company
	Internal Use	The document can only be disseminated within the company. It is permitted to communicate it to third parties with a non-disclosure clause
	Reserved	The document cannot be disseminated within the company. Its visibility is limited to a small group of people.

### CORPORATE 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 compliant with the legal and regulatory requirements **in force, binding contracts, is reviewed according to the acquisition of certification on the Guidelines of 5 November 2013 on good distribution practices for medicinal products for human use, as well as the activities necessary to ensure that the product delivered maintains its quality and integrity and remains within the legal pharmaceutical supply chain 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 the following:

- *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 Security
- 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 and social responsibility
- PdR125/2022 for Gender Equality
- **Guideline of 5 November 2013 on good distribution practices for medicinal products 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 and UNI PdR 125/2022 standards; GDP Guideline
- ◆ define the criteria and implement a methodology for assessing the risks inherent in the critical aspects of its activities, thus determining the acceptable risk levels and intervention protocols, where necessary;
- ◆ monitor and control the organization'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 targets;
- ◆ guarantee the satisfaction of the Customer's needs and requirements;
- ◆ ensure compliance with current legal provisions and applicable requirements;
- ◆ ensure functionality, reliability, transparency, ethics and integrity in its conduct;
- ◆ increase the contribution of "technological innovation" by proposing new solutions both to its customers and within the Organization;
- ◆ strive for the "zero accidents" objective by implementing all the necessary measures in organizational, operational and technological terms to prevent accidents, injuries and occupational diseases;
- ◆ strive for the goal of "zero road accidents" by implementing all the 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 behavior;
- ◆ minimize the environmental impact of its activities and services offered to customers;
- ◆ guarantee secure access to information, in order to prevent unauthorized processing or processing carried out without the necessary rights. - adequate levels of security.
- ◆ establish ethical values and transmit a socially responsible culture in the company;
- ◆ not use, nor support the use of child labour, forced or compulsory labour;
- ◆ not implement or support any form of discrimination;
- ◆ comply with the national collective agreement applied, guaranteeing the protection of workers' rights and observing the provisions contained therein, both of an economic and regulatory nature.
- ◆ ensure that the anti-corruption management system, including the Policy and objectives, is established, implemented, maintained and reviewed so as to adequately address the organization's corruption risks;
- ◆ ensure the integration of the anti-corruption management system requirements into the organization's processes;
- ◆ ensure the distribution of adequate and appropriate resources for the effective functioning of the anti-corruption management system;
- ◆ internally and externally communicate the Anti-Corruption Policy;
- ◆ explain the authority and independence of the anti-corruption compliance function;
- ◆ illustrate the consequences of non-compliance with the anti-corruption policy;
- ◆ ensure that the anti-corruption management system is properly designed to achieve its objectives, as specified in the Review;
- ◆ direct and support personnel to contribute to the effectiveness of the anti-corruption management system;

- ◆ promote an adequate anti-corruption culture within the organization, through communication and training activities, of which appropriate records are kept;
- ◆ promote continuous improvement;
- ◆ support department heads to demonstrate their leadership in preventing and detecting corruption as it may apply to their areas of responsibility;
- ◆ encourage the use of reporting procedures for suspected or actual bribery;
- ◆ ensure that no member of staff will be subject to retaliation, discrimination or disciplinary action for reporting in good faith, or based on a reasonable belief of a violation, even a suspected violation, of the organization's Anti-Corruption Policy or for refusing to engage in corrupt activities, even if such refusal may result in business losses (unless the individual participated in the violation);
- ◆ annually during the review (or upon the occurrence of serious or systematic violations), report to the Sole Director and to the Supervisory Body (pursuant to Legislative Decree 231/01) on the content and functioning of the anti-corruption management system.

The Company Management prohibits the request and acceptance of bribes by personnel and the organization and anyone working on behalf of the organization.

The Company Management undertakes to adequately select its suppliers and ensure that they share and comply with the commitments relating to legislative compliance in terms of the environment, health and safety of workers, ethical behavior, social responsibility, confidentiality of information and the 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 the legal obligations relating to privacy.

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

This policy is published on the corporate website to ensure that all personnel know it and is made available to all third parties involved in the management of information and components of the IT 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 - according to the case.

This company policy is subject to periodic review in the face of internal or external changes to the organization, in order to ensure the validity, adequacy and effectiveness within the Integrated Management System and to promote the commitment towards continuous improvement. TRA.SER personnel are committed at all levels to the purpose of consciously pursuing what is stated in this policy.

Staff may, if deemed necessary, submit reports to the RINA certification body at the email address [SA8000@rina.org](mailto:SA8000@rina.org), to the SAAS accreditation body at the email address [saas@saasaccreditation.org](mailto:saas@saasaccreditation.org) and/or to the Social Accountability International at [info@sa-intl.org](mailto:info@sa-intl.org).

### Business Continuity Policy

With this document, the Company Management defines the following principles of the Business Continuity Policy that it intends to achieve. The purpose of this policy is to plan, establish, implement, operate, monitor, review, maintain and continuously improve a documented management system that enables organizations to prepare for, respond to and react to disruptive events as they occur.

With this document, the Company Management defines the principles of the Business Continuity Policy that it intends to pursue.

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

Resilience of our ability to deliver services in the face of incidents (including general emergency or crisis situations) that may lead to the disruption of such services.

- ◆ **Constant improvement of the services provided**, through the management of organizational processes from the point of view of quality and satisfaction of the entire Customer System
- ◆ **the improvement of the image and reputation on the market, and therefore:** increase in the number of customers, increase in turnover, territorial expansion of the company and entry into any new market areas; consolidation and improvement of the leading position in the sector in which it operates;
- ◆ **the satisfaction of all interested parties (customers, users, employees, suppliers), and therefore:** achievement of budget objectives, increase in the level of employment, salary adjustments, reduced absenteeism and reduced (or none) disputes with employees, constant reduction of number of complaints, high level of satisfaction, partnership agreements with suppliers;
- ◆ **Development of internal human resources**, both for the enhancement of personal aptitudes and for the growth of professional knowledge aimed at improving the efficiency and effectiveness of the service rendered to the Customer;
- ◆ **complete reliability of its processes in order to ensure the full OPERATIONAL CONTINUITY of our services;** through full compliance with the business continuity plans defined;
- ◆ **Full compliance with explicit and implicit contractual commitments;**
- ◆ **the care of communication with the customer;**
- ◆ ensure the safeguarding and protection of human lives in the face of a crisis event;
- ◆ guarantee operational continuity and minimize the impact on the business in the event of a crisis, ensuring a rapid restoration of the normal state of performance of business activities;
- ◆ ensure the resilience of corporate architectures;
- ◆ protect the interests of the Company and increase the trust of its customers and partners, paying particular attention to the aspects of:
  - availability: through the development and implementation of mechanisms that allow the accessibility and usability of services when requested by an authorized entity, even following a disaster;
  - service level: through the development and implementation of mechanisms that guarantee the continuity of the service provided in compliance with the defined SLAs;
  - compliance: compliance with legal and regulatory requirements and contractual obligations.

### Our goals for business continuity

These objectives include:

- ♦ **Maximum Tolerable Outage Period Objectives (MTPD):** time taken for negative impacts, which could arise due to the failure to supply a product/provision of a service or to carry out an activity, to become intolerable;
- ♦ **Recovery Time Objective (RTO):** The period of time, after an incident, within which the product or service must be restored, or business must be restored, or resources must be recovered.

In line with what is defined by the reference standard, the Company Management is actively involved and committed to the implementation, maintenance and improvement of the Business.

### Information 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 a correct management of the company's sensitive data.

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

#### TRANSPORTATION, DIGITIZATION AND ARCHIVING SERVICE OF HEALTH AND NON-HEALTH DOCUMENTS.

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

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 area 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 their criticality, in order to facilitate the implementation of adequate levels of protection.
- b) Ensure 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 complying with adequate levels of security.
- d) Ensure that the organization and third parties collaborating in the processing of information are fully aware of security issues.
- e) Ensure that anomalies and incidents with 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 offices and individual company premises is by authorized personnel only, 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 related records and improvement programs;
- i) promote and implement targeted or widespread training and awareness plans on information security.

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

### Information security can be characterized as the protection of:

**Confidentiality:** it is the guarantee that a given 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/conservation phase, in such a way that the information is accessible only to those who are authorized to know it.

**Integrity:** it is the guarantee that all information is really 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 ensured that the information is treated in such a way that it cannot be tampered with or modified by unauthorized subjects or by automatic systems, even as an element "unrelated" to a specific subject

**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 impose its historical conservation.

The management and improvement of information security are part of a continuous process which must take into account multiple factors of resistance, 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;

- ensure an appropriate level of information security within the life cycle of the services provided to its customers, through the identification, assessment and treatment of the risks to which the services themselves are subject;
- ensure the continuity of corporate 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 personnel;
- safeguard the corporate 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 designed to ensure that the values expressed in this policy are reflected in the behavior of each Company Employee and 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 according to the results achieved.**

**The Policy is disseminated through:**

- appropriate personnel training;
- periodic meetings;
- corporate website.

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

**The direction**



## Gender Equality Policy Presidential Decree 125/2022

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



The Company Management, considering the evolutionary context, formally assumes the commitment for a policy relating to gender equality, defining principles, objectives and guidelines which define the use of the organization in relation to issues relating to gender equality, the enhancement of diversity, and valorisation to support female empowerment.

TRASER srl is a company made up of people, which is why it has decided to adopt this Gender Equality Policy which aims to enhance and protect diversity and equal opportunities in the workplace.

TRASER recognizes gender equality as an essential element of civilization and the affirmation of universal human rights as well as a strategic factor for increasing the creation of value and for the development of the company.

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

In order to ensure the continuous improvement of its performance in the field of Gender Equality, following the guidelines of the UNI/PdR 125:2022, TRASER SRL undertakes to operate so that both in its headquarters and in the temporary sites the following are constantly pursued goals:

- ★ promote a safe working environment where gender equality is an added value;
- ★ ensure its resources the same recognition for equal work, refusing any type of gender discrimination;
- ★ ensure safe workplaces to ensure the participation and work of all employees, in the full expression of their potential, intervening against any inappropriate behavior or contrary to these principles, including harassment, intimidation, threats, coercion and offenses ;
- ★ promote the adoption of practices that value diversity and inclusion also by its suppliers and subcontractors;
- ★ comply with all applicable regulations on gender equality;
- ★ encourage anyone who believes they have suffered discrimination to report it, ensuring the most appropriate investigation procedures and at the same time protecting the identity of the people involved;
- ★ guarantee the continuous improvement of the effectiveness of this Policy, through a system of immediate corrective actions in case of violation of the same.

The Management also undertakes to define a strategic plan, setting up a management model that guarantees over time the maintenance of the defined and implemented requirements, measuring the progress of the results through the preparation of specific indicators (KPI) which are reported in the documents of the management system, through which they maintain and verify the planned actions.

TRASER srl defines and maintains an internal and external communication plan to provide adequate and constant information on the results of the management of its Gender Equality Management System.

Furthermore, the Management periodically verifies the effectiveness of the Gender Equality Policy and Management System through the periodic review of the System, during which all the opportunities for improving company performance are assessed and improvement objectives are established.

To achieve and maintain gender equality in the company, TRASER srl will commit Top Management, employees and all stakeholders to adopt practices, languages and behaviors that pursue this goal and enhance personal diversity.

In particular, the company undertakes to guarantee (through internal policy and through the adoption of a Strategic Plan and a dedicated Management System) compliance with the following points:



- No discrimination can be implemented, and in no case tolerated, during the entire working career of employees from the initial selection up to the highest career levels passing through the daily working routine.
- Spreads the culture of inclusion through information and training.
- Promote, support and enhance motherhood/parenthood in all its phases.
- All communication, whether internal or external, is aligned with the values of gender equality.
- All the necessary prevention activities are put in place so that no form of physical, verbal or digital abuse can take place in the workplace.
- Its Gender Equality Policy, and any updates thereof, are communicated and disseminated within the company and made available on its website.
- The budget necessary to achieve and maintain the objectives of this plan is allocated.
- A Steering Committee (GC) is appointed for the effective adoption and application of the GEP (Plan for Gender Equality).

It is important to underline that TRASER srl has been in possession of the SA 8000 certification since 2005 as evidence of a concrete attention in terms of discrimination.

This Policy integrates with the other Company Policies of Quality, Safety and the Environment, Social Responsibility, Road Safety, Information Security, Business Continuity and Anti-Corruption.

Personnel are required to comply, for the activities under their responsibility, with what is indicated in the Management System, as well as to apply the principles contained in this Gender Equality Policy on a daily basis.

Staff may, if deemed necessary, submit written reports, even anonymously, regarding harmful behavior, abuse, threats and violence by inserting them in the Suggestions/Complaints Box made available in each company office or by sending an email to the Steering Committee: robertascafariello@traser.eu.com

Roma, 18/10/2023

