

INTEGRATED MANAGEMENT SYSTEM POLICY

HWG Sababa S.r.l. implements a quality policy focused on achieving customer satisfaction, trust, and loyalty, as well as compliance with regulations and laws in order to achieve and maintain the following objectives:

- Being a reference point for customers regarding the reliability of products and services provided, as well as adherence to service levels and release times;
- Ensuring excellence in relationships;
- Guaranteeing the satisfaction of both expressed and implied customer needs, as well as statutory requirements.

The company's commitment to these objectives is demonstrated by the systematic adoption, implementation, verification, and continuous improvement of the Quality Management System in accordance with UNI EN ISO 9001:2015 standards.

Similarly, another primary objective pursued by HWG Sababa S.r.l. is the security and protection of information and data entrusted by customers, as well as the protection and reliability of the technological, physical, logical, and organizational structure responsible for data/information management.

For this purpose, HWG Sababa S.r.l. has decided to establish, implement, maintain, and continuously improve an information security management system that is concurrently compliant with ISO 27001, TISAX, European Regulation 2016/679, and Italian privacy regulations, allowing the pursuit of the following macro-objectives:

- Define appropriate levels of information confidentiality, even in the automotive environment, and ensure them through processes and controls that achieve the expected and agreed-upon results with customers;
- Ensure the integrity of information managed on behalf of customers through appropriate processes, methodologies, and controls;
- Adopt, in agreement with customers, measures, processes, and controls that ensure the availability of expected information;
- Constantly assess information security risks in the customer service delivery processes and take appropriate treatment actions;
- Implement the most suitable actions to ensure that the resources involved have the competence and awareness of adequate information security.

This policy represents the ethical and fundamental commitment that HWG Sababa S.r.l. undertakes towards customers and third parties in every phase of relationships and in the provision of its services and products.

HWG Sababa S.r.l. has also decided to align itself with the system outlined by ISO/IEC 20000 standards, aiming to define a service management system and adhere to requirements that enable the planning, design, transition, delivery, and improvement of services, as well as to increase trust in contact with customers, partners, and all stakeholders.

In support of its strategy, the company has implemented and operates an ISO/IEC 20000 Management System that allows:

- Periodic management reviews to evaluate and improve business performance in relation to certain quality indicators;
- Identify and implement corrective actions, if necessary, to reduce the impact of abnormal conditions on the overall system operation to acceptable levels and maintain residual risk at acceptable levels;
- Ensure customer satisfaction by offering and ensuring the delivery of reliable and quality service;
- Ensure business and service continuity;

- Ensure the management and monitoring of parties involved in service delivery through appropriate contractual formalization, communication, performance analysis, and customer and third-party relationship management;
- Establish and maintain transparent and fair relationships with suppliers that bring mutual benefits.

Furthermore, HWG Sababa S.r.l. ensures continuity in the services provided to its customers, even in cases of greater difficulty, and expects the same commitment from its stakeholders.

The company commits – in accordance with the ISO 22301 standard – to systematically and planned pursue operational continuity objectives through, for example, the establishment of a crisis management committee and the definition of recovery point objectives (RPO; time needed to recover information used by an activity to allow it to resume) and recovery time objectives (RTO; the period, after an incident, within which the product, service, or activity must be restored).

In this way, HWG Sababa S.r.l. intends to: manage crises appropriately and promptly, minimizing their impacts on business (its own and that of its stakeholders), ensuring a rapid return to normal business activities; comply with constraints from current regulations and contractual obligations, continuously increasing its reliability; establish an Integrated Management System, including a Business Continuity procedure, that proves effective in practical application.

In order to also guarantee a rapid response to information security incidents, HWG Sababa S.r.l. has decided to align itself with the system defined by the ISO/IEC 27035-1 standard, which allows:

- planning and preparing for the management of information security incidents;
- detecting, reporting, and assessing information security incidents and the vulnerabilities involved in the incident;
- responding to information security incidents, including activating appropriate controls to prevent, reduce, and recover from the impact;
- appropriately managing reported information security vulnerabilities involved in the incident;
- learning from information security incidents and the vulnerabilities involved, implementing and verifying preventive controls, and making improvements to the overall approach to managing information security incidents.

Furthermore, the following principles have been adopted by HWG Sababa to minimize environmental impacts, in accordance with the ISO 14001 standard:

- Comply with applicable legal, regulatory, and technical requirements related to environmental issues, based on the principles of risk prevention and mitigation, including those associated with climate change;
- Monitor its activities with a view to continuous improvement, environmental protection, and pollution reduction and prevention;
- Implement appropriate measures to prevent the waste of energy and natural and energy resources;
- Strive for the minimization and proper management of waste generated;
- Aim to reduce atmospheric emissions, specifically measured in tons of CO₂ equivalent;
- Promote the use of digital tools by encouraging the adoption of internal and external virtual communication systems;
- Educate and raise awareness among all internal collaborators—through training and continuous updates—regarding their specific roles, the importance of processes, and the

impact of outcomes on both customers and the environment, so they can act responsibly and with awareness.

Finally, with specific regard to Anti-Corruption matters, HWG Sababa S.r.l. is committed to conducting its activities in accordance with the UNI ISO 37001:2016 standard, by adopting the following principles:

- It defines appropriate measures to pursue the principles of conducting business in compliance with the law and with integrity, transparency, and fairness in all countries where it operates;
- It applies all necessary procedures to verify compliance with this Policy, the Code of Ethics, and applicable Anti-Corruption Laws, and continuously reviews and monitors the contents of its Anti-Corruption Management System;
- It prohibits all forms of corruption, in any manner or jurisdiction, involving not only Public Officials but also private individuals;
- It undertakes to accurately record all transactions in accordance with accounting principles, in a complete and transparent manner, in order to trace all receipts, payments, and transactions in general.

HWG Sababa S.r.l. is also committed to the continuous improvement of its Management Systems.

Any employee or collaborator who fails to act in accordance with this Policy shall be subject to disciplinary sanctions proportional to the severity of the violation. Any partner or supplier acting in breach of this Policy will be subject to contractual disciplinary actions.

This Policy is communicated to all Recipients through appropriate communication activities. It is the responsibility of each employee to consult their direct manager for any clarification regarding the interpretation or application of the behavioral rules contained herein.

HWG Sababa S.r.l. also commits to providing regular training on this Policy and the related topics it covers.

HWG Sababa S.r.l. promotes a positive approach toward the issues addressed in this Policy to ensure and protect the freedom of expression and reporting by Recipients regarding non-compliance, critical/undesired situations, or other issues related to environmental protection.

Any behavior that is, even potentially, in conflict with the provisions of this Policy must be reported to the competent bodies or functions identified in the internal disciplinary rules and, where established, to the Supervisory Body, according to the procedures defined by the Organizational Model adopted under Legislative Decree 231/01.

HWG Sababa S.r.l. ensures the establishment of appropriate communication channels through which any reports of violations of the provisions of this document may be submitted. The utmost confidentiality will be maintained regarding received reports.

For any questions concerning this Policy or the laws and regulations referenced herein, please contact: **compliance@hwgsababa.com** or make a telephone request at **+39 045 4932800**.

HWG Sababa S.r.l. recognizes employee training and awareness as fundamental tools for the implementation of this Policy.

This policy is communicated within the organization and published in full on the company's website www.hwgsababa.com.