

INTEGRATED POLICY

ICM S.p.A. has been active since 1921 as a general construction company in both the private and public sector carrying out civil, road, hydraulic and infrastructural works in general. The technical-administrative structure, the equipment, the organizational and the productive experience allow the company to deal with tasks of any kind and size, both in Italy and abroad. ICM intends to act as a center of coordination and application of experiences and productive synergies of the whole ICM Group.

Being aware of the ongoing market evolution and the resulting constraints, ICM has decided to propose and implement a competitive model based on the highest quality, as well as on professionalism, sustainability, and social responsibility. It achieves this goal by maintaining, on one hand, an effective integrated management system complying with the UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI 39001, UNI ISO 37001 and SA 8000, and UNI ISO 30415 standards and, on the other hand, a corporate organization system complying with the Italian Legislative Decree 231/2001 based on internationally recognized ethics and compliance principles. It aims at ensuring the ongoing quality of its services and the compliance of its activity with the provisions of the laws in force, with the RTS objectives it has set, with the ILO international conventions, as well as with the contracts in force, with reference to the following field of application:

Design and construction of: civil works including protected real estate assets, infrastructural works for mobility, hydraulic network works. Installation of thermo-fluid and electrical technological systems. Management of activities as a general contractor carried out under TITLE III of the Italian Legislative Decree 50/2016 coordinated with the corrective Italian Legislative Decree 56/2017 and subsequent amendments (EA 28;35)

ICM has always been inspired by the principles of legality, honesty, fairness, transparency, inclusion, impartiality, and confidentiality, as well as by the respect for human dignity, the individual rights and freedom, and the environment in which it operates. Moreover, it pays utmost care to the protection of occupational health and safety and of human rights with reference to both its employees and those who work within the competence field of the organization, as well as to road safety issues and to the prevention of corruption, which is subject to continuous and constant care in order to assure the identification and the compliance with the relevant requirements and with the applicable legislation and regulatory provisions.

The primary goals of ICM are oriented toward six main areas, namely:

1 – QUALITY

- the satisfaction of its customers and the quality of the provided services and of the manufactured products;
- the strict compliance with laws, regulations, regulatory obligations and standards in all countries in which the company operates;
- the diligence and accuracy in the execution of tasks and contracts;
- the measurement of its own performance;

- the continual improvement through the proper management of any detected Nonconformities;
- the training, professionalism and moral integrity of its employees. These principles are implemented by providing our personnel with the necessary knowledge, in order to allow them to always work at the highest level of professionalism, safely and in full compliance with all laws and regulations, to assure the best possible quality level for the provided product/service.

2 – HEALTH AND SAFETY

- the strict compliance with laws, regulations, regulatory obligations and standards in all countries in which the company operates;
- the promotion and dissemination of a safety and continuing education culture at all levels;
- the safeguard in terms of safety and health in the workplace, also with reference to the equipment, machinery and facilities made available;
- the safety guarantees not only towards employees, but also towards suppliers, subcontractors, customers and all other stakeholders involved;
- the reduction of hazards and the elimination of safety risks at the workplace, also with reference to occupational diseases;
- the active involvement of workers in the risk assessment and management processes;
- the mitigation of risks when they occur, as well as the remarkable decrease of road accidents and fines incurred by the employees;
- the protection of the physical and moral integrity of all collaborators.

3 – ENVIRONMENT

- the strict compliance with laws, regulations, regulatory obligations and standards in all countries in which the company operates;
- the promotion and protection of the environmental context in which ICM operates, involving also its Customers, Suppliers, Sub-Contractors, Authorities, Involved Parties and other stakeholders;
- the accountability to the community while conducting the corporate activities fully respecting the environment, ecosystems and biodiversity, for example by reducing the impacts of its production activities in protected areas;
- the accountability to the community in conducting business in compliance with local and national communities, applicable regulations and other legal and non-legal requirements, while also monitoring, but without limitation, the impacts of business operations on local environment, i.e. dust, noise and odor emissions, accidental pollution, and road congestion;
- the promotion of a systematic and consistent reduction in energy and water consumption;
- the promotion of the use of energy from renewable sources, thereby minimizing the emission of greenhouse gases;
- the minimization of waste production by optimizing the recycling and recovery of the same;
- the use of innovative technologies and methodologies in work processes;

- the training of workers aimed at increasing awareness of the need to reduce the environmental impact of business activities.

4 – SOCIAL RESPONSIBILITY, DIVERSITY AND INCLUSION

- the strict compliance with laws, regulations, regulatory obligations and standards in all countries in which the company operates;
- the respect for the workers and human rights, including the adherence to pre-established working hours and wages agreed upon and stipulated in the collective agreements, as well as to the social benefits granted to employees;
- the protection against children exploitation;
- the compliance with the principle of equal opportunities;
- the protection against any kind of (physical, psychological or verbal) discrimination or abuse;
- the monitoring of direct and indirect impacts of its activities on the human rights of external stakeholders such as property/land rights, right to self-determination, safety rights, etc.;
- the social dialogue, through encouraging consultation and participation of workers and their recognized representatives, and through the collective agreements;
- the involvement of all the personnel in order to improve the "Social Performance";
- the awareness raising at all levels with actions aimed at overcoming "unconscious bias";
- the promotion of policies and actions with the aim of promoting equal opportunities and work-life balance;
- the enhancement and the continuous professional growth of human resources with the aim of ensuring access to the same opportunities for training, professional growth and remuneration while respecting individuality and emphasizing different potentials and talents;
- the assurance of equity in all relationships with collaborators;
- the condemnation of any act of discrimination and encouragement of the reporting, by all employees, of any suspected discriminatory cases;
- the spread, at all the organizational level, of managerial and leadership styles that make inclusion the cultural model of reference, also through the responsible management of work teams, in order to support a growing sensitivity and awareness of the importance of differences;
- the identification of any organizational, cultural and relational obstacles that prevent full labor inclusion, as well as the creation opportunities - both inside and outside ICM - including in terms of labor policies.

5 – ETHICS / ANTI-BRIBERY

- the strict compliance with laws, regulations, regulatory obligations and standards in all countries in which the company operates;
- the fairness of ICM and the Group companies and the individuals that operate on behalf of them, taking decisions that affect the relationships with different stakeholders;
- the prevention of conflicts of interest affecting the individuals acting for and on behalf of ICM and such Companies;

- the confidentiality of the managed information;
- the transparency and completeness in the management of information by all collaborators, who are required to provide complete, transparent, understandable, and accurate information;
- the protection of the value of fair competition and of the principles from which this latter should draw inspiration;
- the application and continual improvement of the Management System for the Prevention of Corruption, in accordance with UNI ISO 37001:2016;
- the guarantee of an adequate level of training and information to all personnel and their constant consultation for the purpose of improving the Management System for the Prevention of Corruption and of consolidating a social culture aimed at fighting against corruption;
- the condemnation of any act of corruption and the encouragement to all employees to report any suspected cases of corruption.

6 – SUSTAINABLE PURCHASING

- The ethical sourcing, consisting of the evaluation and selection of subcontractors and suppliers who share and apply the same sustainability standards applied by ICM with reference to quality, environment, safety, ethics (including labor practices and human rights), inclusion, impartiality, and fight against corruption, by means of the dedicated supplier portal and other sustainability assessment tools being implemented;
- the adoption of a collaborative approach in dealing with subcontractors and suppliers, which are an integral part of the corporate sustainability strategy;
- the involvement of local communities through job offers, requests for quotations to businesses operating in the same area.

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This policy is disseminated to all our employees when they are hired or begin working with the company and is made available to all stakeholders on the corporate webpage, besides being posted on the corporate and construction site bulletin boards.

The Company makes every effort to ensure that this corporate policy is effectively implemented, subjecting it to periodic reviews (at least every year), also through the verification activities foreseen by the Integrated Quality, Environment, Safety, Road Safety, Prevention of Corruption and Social Responsibility System, as well as by the Organization, Management and Control Model, in order to pursue the continuous improvement. The person in charge of this policy, as well as of the entire Integrated Management System is Mr. Andrea Fabbri.

Thanks to this policy, ICM is in a position to offer a highly qualified and competitive activity and to play a leading role in the realization of important works in the construction industry.

The Integrated System Manager

Mr. Andrea Fabbri



The Managing Director

Mr. Darik Gastaldello

