



INTEGRATED POLICY IVS GROUP

january 2022

IVS Group S.A., the Parent Company of enterprises operating on the automatic vending machines market for food and beverages, considers the following to be indispensable for the development of its operations: the quality of its processes and related services, the health and safety of workers, food safety, the environment and humanity itself, in accordance with the principles of sustainable development, the prevention of corruption, so as to ensure the maximum efficacy and efficiency of the processes, activities and resources.

In order to achieve these objectives, IVS GROUP S.A. decided to adopt an Integrated Management System based on Risk Based Thinking, not as an independent analysis separate from its processes and activities, but as a way to manage the same. A new concept that Senior Management wants to promote within the entire organisation.

This Policy reflects these choices by "integrating" the various aspects for which IVS GROUP S.A. defines and documents its commitment to all its Stakeholders, to improve performance and, at the same time build and develop trust-based relationships with the same as part of a process of generating and sharing Corporate values, with a view to achieving continuity and reconciliation of its interests. In order to guarantee this commitment, IVS GROUP S.A. has adopted a Code of Ethics widely used by all its Stakeholders.

IVS GROUP S.A., and its associated Vending Companies, therefore undertake to fully comply with the regulations in force: UNI EN ISO 9001:2015 - quality management, UNI ISO 45001:2018 - occupational health and safety management, UNI EN ISO 22000:2018 - food safety, UNI EN ISO 14001:2015 - environmental management, UNI CEI EN ISO 50001:2018 - working, environment and humanity aspects according to the principles of sustainable development, UNI ISO 37001:2016 to prevent specific cases that could result in potential and/or tangible corruption crimes.

In carrying out its activities with such an integrated perspective, the Companies undertake to:

1. Put in place and update procedures that provide the rules and regulations concerning the performing and monitoring of the processes related to the Integrated Management System.
2. Maintain an Integrated System Management Group coordinated by a Manager designated by Senior Management, appropriately trained and instructed on topics related to the Integrated Management System.
3. Put in place a preparatory phase aimed at identifying external or internal factors that can influence the Integrated Management System: Context Analysis ensuring all stakeholders the analysis and assessment of risks with respect to the provision of services.
4. Use appropriate tools and indicators to monitor performance concerning quality, occupational health and safety, food safety, environment, sustainable development, prevention of corruption.
5. Conduct verification phases of the activities and results obtained with respect to certifications, through the self-monitoring of the systems, with a view to continuous improvement.
6. Motivate, empower and raise awareness among personnel of the aspects envisaged by the Integrated Management System using the tools and the most appropriate channels with a view to ensuring continuous improvement of the processes.
7. Develop an informative and experiential heritage, through ongoing personnel training, in order to achieve the objectives of the Integrated Management System.
8. Promote the reporting of possible criticalities found in the application of the Integrated Management System and to provide evidence of the action taken according to the policy guidelines.
9. Make available the data relating to its business activities on the dedicated website.
10. Carry out routine revisions and updates of the objectives and procedures using the control systems (Audits and reports) that make it possible to evaluate performances, review and adapt the policy along with related targets and plans.
11. Ensure safety against the COVID-19 pandemic, by amending actions and behaviours including:
 - intervention protocols on the equipment, adapting restocking and visits by customers, using more specific products and intensifying cleaning and sanitation activities.
 - the updating of the risk analysis redesigning our supply chain (quantities of goods and supplies) in order to respond immediately to the actual internal and external demands.
 - communications to Customers, specifying what actions we have taken to protect end consumers in all our contexts.
12. Organise audits of its integrated management system by ACCREDIA, an accredited third-party auditor.

QUALITY

More specifically, for Quality aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI EN ISO 9001:2015** standard, with the adoption of the following principles:

- **To ensure** adequate quality of the services, in particular by ensuring efficiency and continuity of services in accordance with the required requisites;
- **To maintain** adequate services to customers;
- **To respect** timing aspects and optimise the cost/quality ratio of the products/services.

OCCUPATIONAL HEALTH AND SAFETY (OH&S)

More specifically, for Occupational Health and Safety aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI ISO 45001:2018** standard, with the adoption of the following principles:

- **Comply**, with the contents and principles of the legal provisions on occupational health and safety applicable to the activities managed by the same and, where possible, voluntarily apply additional preventive and protective measures deemed necessary, even in the absence of legislative obligations;
- **Promote** any activities aimed at preventing, in all operations, the occurrence of accidents, which could compromise the safety of its workers and any third-parties potentially involved;
- **Make available**, consistent with the budget targets, the human and material resources necessary to ensure achievement of the pre-set safety objectives;
- **Pursue** continuous improvement of safety management in all its branches, also by identifying the risks associated with the specific activities carried out and the defining of objectives to reduce the same, in accordance with the development plans and the available budget;
- **Guarantee** the consultation of workers, through their Workers' Representatives, on company decisions regarding the implications that these may have on occupational health aspects and compliance with prevention and protection measures;
- **Boost awareness** and inform all employees, collaborators and staff of contractor companies of the need to comply with the occupational safety and hygiene standards applicable to the service they provide at the company branches, as well as all activity carried out on the territory;
- **Train** employees and collaborators to use the most important work equipment and to intervene in anomalous and emergency conditions so as to minimise all possible consequences;
- **Use** in their production cycles appropriately selected and tested products in order to achieve the necessary results producing the least possible impact on occupational health and safety aspects;
- **Implement** operational procedures aimed at codifying the safe execution of the various processing phases, in order to guarantee the safety of workers and any potentially affected third-parties;
- **Promote** a transparent and collaborative relationship with public bodies, private individuals and local communities.

FOOD SAFETY

More specifically, for Food Safety aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI EN ISO 22000:2018** standard, with the adoption of the following principles:

- **Introduce** and maintain all the interventions required to ensure that the activities carried out at the Organisation's branches (offices and depots) meet the legal Food Safety requirements, and any further requirements agreed with Customers;
- **Establish** measurable objectives and monitor activities with a view to controlling Food Safety hazards, so that the products do not directly or indirectly cause any harm to consumers;
- **Periodically assess** and update the Food Safety system in order to ensure that the system envisages the latest information on monitored food safety hazards;
- **Communicate**, throughout the supply chain and within the organisation itself, information concerning the development, implementation and updating of the Food Safety management system concerning the safety aspects of the products used;

- **Establish**, implement and maintain procedures to manage potential emergency situations and incidents that could impact food safety and are relevant to the role that the organisation plays in the food supply chain.

ENVIRONMENT

More specifically, for Environmental aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI EN ISO 14001:2015** standard, with the adoption of the following principles:

- **Introduce** and maintain all the interventions required to ensure that the activities carried out at the Organisation's branches meet the legal environmental requirements;
- **Monitor** its activities with a view to continuous improvement and reduction and prevention of pollution;
- **Use** the best available plant system technologies, consistent with the economic resources, so as to minimise the impact on the environment and obtain a quality product;
- **Adopt** all appropriate measures to prevent waste of energy and natural and energy resources;
- **Pursue** the minimisation and suitable disposal of the waste produced during the course of production activities;
- **Pursue** the minimisation of emissions released into the atmosphere as equivalent tons of CO₂;
- **Provide** Customers with an efficient and reliable technical and commercial support service that meets the expected requirements;
- **Collaborate** with Suppliers with the aim of achieving mutual development with regards to the environmental and quality aspects of the service provided to customers;
- **Put in place** systematic measures to guarantee that the contractors / suppliers working on the site on behalf of our company apply equivalent environmental standards to those adopted by our Organisations;
- **Instruction** and awareness, with training and refresher courses for all internal collaborators, according to the tasks performed, the importance of the processes and the effect of the results on the client and on the environment, to enable them to operate in a responsible and awareness based manner.

ENERGY

More specifically, for Energy aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI CEI EN ISO 50001:2018** standard, with the adoption of the following principles:

- **Security** of supply and energy independence;
- **Improvement** of efficiency and relative energy savings;
- **Reduction** of greenhouse gas emissions in compliance with the objectives set by the Kyoto protocol;
- **Reduction** of dependence on oil in favour of renewable energies;
- **Propose** and extend the relevant aspects to its customers.

ANTI-CORRUPTION

More specifically, for Anti-corruption aspects, the Companies undertake to carry out their business activities according to the provisions of the **UNI ISO 37001:2016** standard, with the adoption of the following principles:

- **Define** the most suitable measures to pursue the running of its business in respect of legality, integrity, transparency and fairness in all countries in which it operates;
- **Apply** all the procedures required to verify compliance with this Policy, the Code of Ethics and applicable Anti-Corruption laws and constantly review and monitor the content of one's Anti-Corruption System;
- **Prohibit** any type of corruption, in any form or manner, in any jurisdiction, involving not only Public Officials but also private entities;
- All transactions **must** be accurately documented, in accordance with accounting standards and in a complete and transparent manner in order to track all takings, payments and transactions generally.

The application of this Policy is the direct responsibility of the Directors, Statutory Auditors, Managers and Employees of the IVS Group, as well as all those who - directly or indirectly, permanently or temporarily - enter into rapports and relations with the Group.

Breach of this Policy, as well as all corruption laws and regulations, can result in severe criminal and/or civil penalties for both the Company and the individuals involved.

It is important to always act in a manner so as to avoid even the seemingly appearance of a possible breach of these restrictions. In some jurisdictions, fines and financial penalties are unlimited and often exceed several million euros. Individual criminal penalties may amount to ten or more years of imprisonment and include personal financial penalties, which the IVS GROUP S.A. cannot pay on behalf of the individual concerned.

Any breach of this Policy or corruption laws and regulations can result in disciplinary measures being imposed by the Company, which could extend to the dismissal of the person responsible.

The IVS GROUP S.A. management will constantly monitor and verify employee compliance with this Policy, the procedures adopted and the laws and regulations cited therein.

Recipients are encouraged to report any possible violation of the Anti-Corruption System of which they become aware, even indirectly, during their activities whilst reporting agents are guaranteed protection from any form of retaliation, discrimination or penalisation, without prejudice to legal obligations.

Any employee or collaborator who does not act in accordance with this Policy shall be subject to disciplinary sanctions, commensurate with the seriousness of the infringement. Any partner or supplier who does not act in accordance with this Policy shall be subject to the contractual disciplinary penalties.

For any questions regarding this Policy or the laws and regulations mentioned herein, please contact:

Antibribery Officer (Compliance Office for the prevention of corruption) - whistleblowing.gruppoivs@gmail.com