



Quality and Environmental Policy
Public



QUALITY AND ENVIRONMENTAL POLICY

October 25, 2023

© Copyright OverIT

The information contained in this document is the property of OverIT. Permitted use depends on the level of confidentiality provided for and specified in the header in accordance with the terms of OverIT's Data Classification Policy. Only those users identified as "Recipients," may access this document upon explicit approval from OverIT. If you are not among these Recipients, please close the document and disregard it.

Table of contents

- 1. Introduction 3**
- 2. Terms and definitions 3**
- 3. Scope of Application..... 4**
- 4. Roles and responsibilities 4**
- 5. General principles 4**
- 6. OverIT's commitments 4**
 - 6.1.1. Facility management..... 5
 - 6.1.2. Energy consumption 5
 - 6.1.3. Corporate car fleet and transportation 6
 - 6.1.4. Home-work commute 6
 - 6.1.5. Waste Management..... 6
- 7. References 7**
 - 7.1. Internal references 7
 - 7.2. Relevant Legislation 7

1. Introduction

The *Quality and Environmental Policy* (hereinafter "Policy") is intended to state the Company's commitment to the consistent pursuit of the highest possible quality standards, the protection of the environment, as well as the reduction of their environmental impact.

In support and guidance of this commitment, OverIT has also adopted an Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity (hereinafter "IMS") to serve as a benchmark and underpinning for any further activities aimed at consistent improvement.

A distinctive attribute of this IMS is the integration, to the greatest possible extent, of Quality and Environment systems compliant with the requirements of UNI EN ISO 9001 and UNI EN ISO 14001, with those of Social Responsibility and Equal Opportunity in accordance with the requirements of SA 8000 and UNI/PdR 125.

The Policy is aligned with the four corporate values advocated by OverIT:

- **Trust** - Nothing is more important than the reliability and security of our systems.
- **Customer Success** - We only grow if our customers grow.
- **Excellence** - Every team and individual strives to be the best at what they do.
- **Simplicity** - Simplification and optimization are key.

This Policy is available for consultation both to internal users on the corporate intranet (at overme.overit.it) and to external ones on the official website, or upon request from the stakeholders. Moreover, the Policy is Annex 1 to the *Integrated Management System Manual for Quality, Environment, Social Responsibility and Equal Opportunity*, which is available to internal users on the corporate intranet. This Policy is subject to the relevant audits conducted during Management Reviews, and is updated accordingly, if so required.

2. Terms and definitions

Environment: the context in which an organization operates, which includes air, water, land, natural resources, flora, fauna, human beings and their interrelationships.

Company: OverIT S.p.A. and companies subject to its management and control. Hereinafter, also referred to as "OverIT," "Organization," or "Company."

General Management or Management: an individual or group of individuals who lead and control an organization at the highest levels, which OverIT identifies in the function of Chief Executive Officer.

Integrated Management System Manual: document providing guidelines and core support to the entire Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity.

Organization, Management and Control Framework (i.e. "OMC Framework"): set of protocols that regulate and outline the corporate framework and the management of its sensitive processes. If properly developed, adopted, updated, and enforced, it is a tool that reduces the risk of committing criminal offenses.

Quality: extent to which a set of the intrinsic attributes of an object meets the requirements.

Management Review: analysis conducted at regular intervals by the General Management to assess performance against the objectives set and to verify the consistency and effectiveness of the Management System implemented.

	TITLE	Quality and Environmental Policy
PUBLIC	VERSION	1.0
	DATE	October 25, 2023

Integrated Management System or **IMS**: part of an organization's management system that is used to manage environmental matters, fulfill compliance obligations, and address risks and opportunities (the distinctive features of OverIT's IMS were detailed in Chapter 1).

3. Scope of Application

This Policy applies to all employees within the Company, who must always adhere to its principles in all circumstances, in addition to current laws and regulations.

4. Roles and responsibilities

Without prejudice to the specific responsibilities of the General Management, as outlined in Chapter 5 - Leadership of the *Integrated Management System Manual*, the function of Chief Executive Officer appoints an Integrated Management System Manager (hereinafter "IMSM") who is responsible for the operative management and shall authorize the actual implementation, document management, and effectiveness control of the IMS. OverIT identifies the role of the IMSM in the function of the Sustainability Manager.

5. General principles

The approach adopted by OverIT in the management of Quality and Environment focuses on meeting the needs and expectations of all stakeholders, specifically addressed to the protection of the environment and the well-being of the communities involved. This not only entails that OverIT must comply with the current legislation (including environmental regulations), but that it is committed to minimizing the impacts its operations may have on the environment.

As a service company, OverIT acknowledges the moderate environmental impact it causes, while identifying the following work and improvement areas:

- energy consumption at the Organization and Data Center premises;
- generation of CO₂e emissions associated with the displacements of the corporate car fleet;
- management of municipal and specific waste (toner, WEEE - Waste Electrical and Electronic Equipment) at the Organization's premises.

Furthermore, while OverIT has no significant impact on the consumption of water resources, it also adopts use practices aimed at conserving water.

6. OverIT's commitments

To best combine the principles of Quality with Environmental protection, OverIT is committed to:

- leveraging the valuable technical know-how acquired over time;
- anticipating, where possible, the products and solutions required by the market;
- setting improvement goals;
- complying with customer and mandatory requirements;

PUBLIC	TITLE	Quality and Environmental Policy	PAGE 4/8
	VERSION	1.0	
	DATE	October 25, 2023	

- investing in research activities;
- monitoring risks and opportunities on an ongoing basis.

Furthermore, to develop an effective decarbonization plan that is consistent with its business activities, OverIT undertakes the following systematic actions to safeguard the environment:

- assessment of the environmental impact of its activities, also by contemplating scenarios of potential environmental emergencies and developing dedicated procedures aimed at their management;
- assessment of the environmental impact of new solutions and processes, while ensuring that the interests of the community, administrations, and employees are met;
- analysis and implementation of further initiatives, to complement those already in place, to manage the mobility needs of people, in consideration of the wide territorial spread of the Company;
- diligent management of energy consumption generated by business activities, mainly regarding Data Centers, which are outsourced through approved international suppliers ensuring the use of energy from renewable sources;
- promotion of responsible conduct practices among employees to increase awareness on potential environmental impacts;
- identification of any interrelation between corporate operations and climate change with a view to a growing commitment to environmental sustainability.

6.1.1. Facility management

Throughout the entire process of locating potential new business locations, OverIT is committed to:

- determining administrative compliance through the implementation of due diligence;
- preferring, where possible, locations that adopt energy efficiency protocols (e.g., availability of recognized certifications, presence of devices which identify presence-detection to reduce unnecessary lighting, etc.);
- sharing for acknowledgement this Policy with the property owners of the different company offices, to promote a widespread culture of environmental protection.

Furthermore, the Organization is committed to considering the purchase of energy deriving from renewable sources when competitive costs arise.

6.1.2. Energy consumption

With regard to air conditioning and heating systems, the Organization is committed to:

- setting the indoor temperature of offices according to local regulations (if any), ensuring a threshold no lower than 24°C during hot seasons and no higher than 21°C during cold seasons;
- implementing control strategies while considering the peculiarities of each location, which may affect the accurate monitoring of temperatures, at times;
- turning off or reducing heating and cooling systems at night, weekends, and on holidays;

PUBLIC	TITLE	Quality and Environmental Policy	
	VERSION	1.0	PAGE 5/8
	DATE	October 25, 2023	

- reminding exiting occupants to switch off the lights and other electrical equipment when they are the last to leave the room, especially at the end of the workday and on weekends;
- recommending such virtuous practices even while working remotely (agile working).

With regard to IT and data storage, OverIT is committed to:

- assessing with utmost diligence any proposals concerning the purchase, rental, or leasing of IT devices from suppliers that implement conducts which are oriented towards carbon neutrality, or any other actions aimed at positively impacting the environment (e.g., use of recycled materials and offsetting CO₂e emissions, etc.);
- investigating low-power solutions, where applicable, or with similar environmental benefits upon return of rental devices;
- minimizing printing through the adoption of general-purpose printers, only and configuring them by default for double-sided, black-and-white, medium-quality printing;
- installing automatic hibernation systems for printers;
- encouraging the use of digital solutions for signing documents;
- periodically scanning cloud drives for redundancies and assisting cloud providers in maintaining environments;
- exploring efficient logistics solutions for moving IT equipment.

6.1.3. Corporate car fleet and transportation

With regard to the corporate car fleet, the Organization is committed to:

- prioritizing the rental, leasing or purchase of low-emission corporate vehicles and in any case with CO₂e emissions not exceeding 160 g/Km;
- establishing further limitations in the future in the event of competitive costs.

6.1.4. Home-work commute

With regard to home-work commutes, OverIT implements the Location Flexible Policy that offers all employees the highest flexibility standards in working from remote locations. In the event of employees commuting to corporate offices, OverIT encourages the use of public transportation and/or the adoption of environmentally friendly alternatives (e.g., biking, car-sharing, etc.).

6.1.5. Waste Management

With regard to waste management, OverIT is committed to:

- formalizing a waste management procedure (both for urban and special waste), providing for separate waste collection within the company's premises and raising everyone's awareness on its importance;
- deterring employees from employing single-use plastic by providing each new hire with refillable water bottles and making available within the corporate premises suitable devices for the distribution of drinking water.

7. References

7.1. Internal references

This Policy is related to other documents that form part of the *Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity*, which are listed below.

Reference	Description
Code of Ethics;	Comprehensive collection of principles and guidelines that define the values, conduct standards and moral expectations that guide activities and relationships within OverIT and drafted in accordance with the provisions of Legislative Decree 231/2001.
Integrated Management System Manual	Central guidance and support of OverIT's entire Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity.
Location Flexible Policy	Policy providing the highest flexibility standards when working remotely for all OverIT employees.
Environmental Assessment Procedure	Operating procedure that establishes the method and criteria the company adopts to assess the environmental impact of its activities, in accordance with the provisions of the UNI EN ISO 14001 standard.
Waste management Procedure	Operating procedure that outlines the systematic approach implemented for the proper management and disposal of waste within the organization, in accordance with the provisions of UNI EN ISO 14001.
Environmental Emergency Procedure	Operating procedure that establishes the actions to undertake when an exceptional event occurs that could result in adverse environmental impacts, in order to mitigate potential risks and minimize damage, in accordance with the provisions of UNI EN ISO 14001.

7.2. Relevant Legislation

This Procedure complies with the contents of the following relevant legislation.

Reference	Description
UNI EN ISO 9001	ISO reference standard for quality management systems.
UNI EN ISO 14001	ISO reference standard for environmental management systems.
Legislative Decree 231/2001	Rules and regulations governing the administrative liability of legal persons, companies and associations, including those without legal status, pursuant to Legislative Decree 231 of 2001.

	Role	Name	Signature
Approved by:	Chief Executive Officer	Pierpaolo Bergamo	Signature executed in the Italian version of the Policy