

	<p>LAM QUALITY – ENVIRONMENT – SAFETY – “E.S.G.” POLICY</p>	<p>PDQ-ESG Rev. 10</p>
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L.A.M. S.p.A. QUALITY, ENVIRONMENT, SAFETY, SUSTAINABILITY AND SOCIAL RESPONSIBILITY POLICY



“Often details make the difference: we produce the details of industrial vehicles that determine and will determine the limit of success for our Customers and their products.”.

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1. COMPANY PROFILE

L.A.M. S.p.A. is an Italian Company leader in the design, construction and marketing of roof hatches and roller blinds, as well as a manufacturer of fittings and plastic components. Thanks to constant technical research, product and process innovation, excellence in service performance and flexibility, and the high quality of the materials, L.A.M. S.p.A. has been at the top of the Market of fittings for buses, trucks, industrial vehicles, agricultural and earthmoving machinery, railway convoys and boats for fifty years.

Service efficiency

A widespread network of dealers and sales agents and a good internal organization allow L.A.M. S.p.A. to respond, in a reasonably short time, to any request or need made by Customers.

Customization

The internal Technical Studio guarantees L.A.M. S.p.A. Customers availability and flexibility, in terms of customization and co-design on products and projects.

Flexibility and Quality

L.A.M. S.p.a. is capable, available and structured to be able to manage orders that are numerically very different from each other, from small orders of a few units to large series with tens of thousands of pieces to produce, maintaining the quality standards required by the market and by Customers.

LAM S.p.a. is in continuous “movement”, to adapt to the changes in the context in which it operates and to overcome the new challenges that arise every day; from **1975** to nowadays, the organization has constantly renewed and structured itself, developing an **Integrated Management System**, certified with the main Standards, aimed at pursuing **Continuous Improvement**.

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2. COMPANY POLICY – PRINCIPLES, VALUES AND TARGETS

L.A.M. S.p.A.’s Board considers **Process Management** in the “**P.D.C.A**” perspective an efficient tool to support business development; therefore, it diffuses and promotes internally, at any level of the organization, **Quality** objectives and principles with the same determination and consistency used for the diffusion and achievement of production targets; it also recognizes that Quality is an interdisciplinary process that involves, interests and supports all the functions and activities of the organization. The organization, oriented to maximize productivity and satisfy Customer needs in the constant reduction of the cost of its products/services, must at the same time tend to the “**zero defects**” standard, in order to achieve an increasingly complete **satisfaction of the Customers**.

L.A.M. S.p.a. has always placed involvement and **awareness** of **human resources** among the priorities of its Management, in order to make each individual responsible for achieving Company objectives in full **compliance** with **applicable laws, rules** of **UNI PdR 125** and **principles** and **values** expressed in this document and referred to in the Company **CODE OF ETHICS**.

Furthermore, in order to achieve **Sustainable Development**, the organization believes it is essential to guarantee in its whole production, commercial and management activities the best protection and safeguard of **Environment, Health and Safety** at workplace and, consequently, of interests and **rights** of all the “**Stakeholders**” interested and/or impacted by the range of operations of L.A.M. S.p.a.

L.A.M. S.p.A.’s Board is aware and convinced that a **honest, correct, transparent, inclusive and previously indicated Laws, values and principles respectful** corporate management conduct, is essential to achieve the **Continuous Improvement** of its organization, to contribute to **Social Well-being** and support positive developments considering the increasingly current issue of **Climate Change**.

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L.A.M. S.p.A. recognizes the values and pursues targets of Sustainability in the field of Environmental, Social and Administrative Responsibility, referring to the principles and management practices “E.S.G.”.

3. ORGANIZATION’S ENGAGEMENTS

L.A.M. S.p.a. undertakes to share publicly and at any level of its organization, including the supply chain, the target set, the principles and the declared values, **through the implementation of the following activities and compliance with the following constraints:**

Quality field:

- Design and produce high quality, efficient and reliable components, at low costs, with particular attention to items meant for the Automotive sector;
- Create involvement and awareness in employees, strengthen the sense of responsibility and spread the process approach, the principles of Risk Analysis and general culture of Quality;
- Consider Suppliers as "partners", share with them the needs and expectations of L.A.M. S.P.A. and its Customers, with the aim of developing increasingly reliable and high-performance Quality Management Systems and increasing opportunities of growth in turnover and margins.

Environment and Safety field:

- Design and develop, compatibly with the available technologies and economic resources, the legislative and qualitative constraints imposed by the Customers, components in recyclable and/or reusable materials, with a “life cycle” compatible with the principles of the “Circular Economy”;
- Develop, as far as economically and technically possible, production processes with controlled emissions/waste and aimed at reducing and/or eliminating the production of

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polluting elements and/or dangerous for Health and/or for the Environment, and/or the waste of natural resources;

- Measure, and as far as possible reduce, the generation of gases and substances with a “greenhouse effect” in the manufacturing processes of the products/services of LAM S.p.a.;
- Promote and incentivize correct management of “special” waste produced by the organization, the internal separate collection of “urban” waste, the optimization of consumption and the reduction of waste of electricity and water;
- Encourage the use of renewable energy sources, maximizing the exploitation of the photovoltaic system the organization is equipped of;
- Design and create, as far as technically possible, safe, healthy, comfortable and decent work environments and workstations, taking into account the essential aspects related to Safety from the early stages of development;
- Monitor, analyse and prevent, through the professionalism and the tools available to the organization, potential dangers and risks related to the Health and Safety of workers, with particular attention to aspects related to production and auxiliary departments (presence of moving vehicles, chemical and physical risks, manual handling of loads, climate and conditions of the work environment in general);
- Pursue a policy of continuous improvement of its performance in the field of Health and Safety in the workplace, involving the whole company structure (Managers, Supervisors, Workers, etc.) in terms of responsibilities and competences and reducing, where technically possible, to zero, any negative impact on the Health and Safety of all personnel affected by the organization's activities;
- Maintain constant attention so that all workers are trained, informed, made aware and consulted in relation to the role and task performed, to carry out their tasks safely and to assume their responsibilities in terms of Safety;
- Develop and consolidate a constructive relationship with the interested parties or "Stakeholders" (competent authorities, workers, customers, suppliers in particular of

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outsourced processes or products, citizens, etc.) with respect to the relevant Environmental and Health and Safety aspects of the workers in its plants;

- ensure the protection of customers' personal data and intellectual property during operational activities through adequate training and awareness of workers.

Social Responsibility field:

- Prohibit, reject, and repudiate any form of child exploitation, child labor, and/or forced labor, or work obtained through coercion and threats of any kind, physical and/or psychological blackmail, confiscation of identity documents, deductions from wages and/or allowances, requests for money, etc.;
- prohibit, reject, and repudiate any activity that may clearly support slavery and human trafficking, or any activity that expressly violates universally recognized human rights in standards such as the European Convention on Human Rights, the Charter of Fundamental Rights of the European Union, and the Universal Declaration of Human Rights adopted by the United Nations; Reject and repudiate any form of harassment, mobbing and sexual harassment;
- train and inform their employees and collaborators regarding the above-mentioned human rights standards;
- prohibit, reject and repudiate any form of harassment, mobbing and sexual harassment within their operational sphere;
- reject and repudiate the use of natural resources whose extraction and trade may finance or support armed conflicts, especially in politically and socially unstable geographical areas;
- reject, repudiate, and, where relevant, report to the competent authorities, any proposal and/or form of illegal collaboration/contract within the organization's operational scope, in particular any practice and form of aiding and abetting and corruption in relationships with

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Customers and Suppliers and any form of counterfeiting of documents, products, and authorizations;

- monitor and incentivize the sharing and compliance with the anti-corruption and anti-counterfeiting principles and standards adopted by the organization throughout the entire supply chain, through the subscription to the LAM Policy and Code of Ethics;
- ensure adequate training and awareness for workers regarding respect for “diversity”, their rights and duties and procedures for reporting abuse/harassment such as, for example, the “whistleblowing policy”;
- ensure that all potential workers are offered fair, impartial, and compliant recruitment and selection processes that comply with all applicable laws and regulations within the organization's scope of operations;
- prohibit, reject and repudiate any form of personal recruitment conditioned on the payment of bribes and/or compensation by the potential worker, covering all costs associated with the recruitment with any institutions or employment agencies;
- guarantee workers' right to withdraw from their contracts at any time and without penalty, as provided by law and the national collective bargaining agreement;
- ensure that workers can receive documents and information about their rights, duties, and responsibilities in a language they understand;
- guarantee the right of workers to freedom of association and membership in a trade union, without any discrimination for the representatives and members of the union itself, as well as the freedom to freely elect their own representatives within the organization;
- prohibit, reject and discourage any type of discrimination, whether of an ethical, racial, cultural, religious nature, and/or attributable to sexual orientation, gender, social class, physical and/or psychological disabilities, invalidity, temporary incapacity, maternity and/or paternity conditions, trade union or political membership, ...;
- prohibit and discourage, at any level of the organization, the application of any form of corporal punishment, coercion and/or physical, verbal or psychological violence;

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- guarantee employees references (internal and external), tools and opportunities for the implementation of the "whistle-blowing policy" and the "escalation" process;
- guarantee workers, through internal procedures and qualified personnel, fair and impartial investigations and judgments in cases of violations of company standards and regulations;
- ensure that the organization complies with all legal obligations regarding labor, the environment, safety, compliance with contractual agreements and minimum wages as set out in the "National Collective Labor Agreement" (CCNL) and any second-level agreements.
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L.A.M. S.p.A.’s Board subscribes without reservations to the principles and commitments above, and certifies its direct responsibility in the implementation of the above, **committing itself** to find and make available the resources and means necessary to guarantee the effective implementation of the Integrated Management System, at any levels of its organization; it also undertakes to distribute and diffuse this policy both inside and outside the Company.

L.A.M. S.p.A.’s Board jointly assigns to the functions of Integrated Management System Manager, Quality P.O., Environment P.O., Safety P.O. / Health and Safety Management Manager and Gender Equality P.O. the **responsibilities** for the maintenance and development of the **Integrated Management System**, in order to implement what has been declared, monitor and achieve **Continuous Improvement**.

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CERTIFICATIONS of the INTEGRATED MANAGEMENT SYSTEM

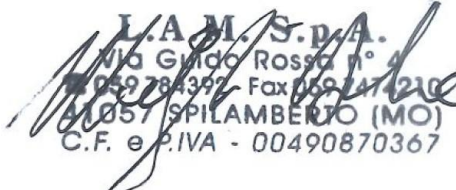
L.A.M. S.p.A. has achieved, or is in the process of achieving, Third Party Certification according to the following Standards/Regulations:

- ✓ **IATF 16949:2016;**
- ✓ **ISO 9001:2015;**
- ✓ **ISO 14001:2015;**
- ✓ **UNI PDR 125:2022;**
- ✓ **ISO 45001:2023** (in process 2026).

LAST REVIEWS INDEX

Rev.09	24/02/2022	Complete review in view of the development of the Integrated Quality and Environment Management System – added ISO 14001 references
Rev.10	06/06/2025	Complete review with a view to developing the Integrated Management System for Quality, Environment, Safety, Gender Equality, Sustainability (ESG)
Rev.11	29/01/2026	Integration of Social Responsibility and Safety commitments.

Update by	Board approval
RSIG A. Cupido	D. Malagoli


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