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	<b>TRATOS GROUP POLICY</b>				
<b>DRAWN UP</b> G. Calchetti		<b>CHECKED AND AUTHORIZED</b> Albano Bragagni			


## FOREWORD

This document illustrates the General Policy of the TRATOS GROUP. It is acknowledged and supported by all employees. To enforce this Policy, the Management shall define from time to time specific targets for improvement through the Reviews described on paragraph 5.2 of the MSG013 Manual. They shall also release the relevant directives and assign the necessary resources.

This Policy is subject to periodic reviews and, if necessary, will be updated by the Management.

## DECLARATION OF THE TRATOS GROUP POLICY


This Policy Declaration is the necessary base for the MSG013 Manual and OHSAS 18001, which define the Management Systems of TRATOS S.r.l., TRATOS CAVI S.p.A. and TRATOS HV S.p.A. in compliance with the ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 standards. These manuals are the tools used to achieve the set management goals and to meet the clients' needs and expectations. We believe that the satisfaction of the above standards not only provides factual evidence of the quality levels attained in the production process, but also allows us to improve constantly, based on innovative organisational models whose output are products that are more and more competitive. Our Management Systems are based on a process-oriented approach that is designed in compliance with the reference standards. After a thorough planning and documentation stage, this approach is applied systematically to the whole production system in order to establish and differentiate Tratos in the cable market, using the pursuit of top quality as a strategic device. All staff is fully involved in the achievement of the company's goals. The heads of the functional services are trained to define a set of common goals and shared subject areas within the organisation, thus creating and maintaining a work environment that promotes the commitment of all employees. The Policy of the TRATOS GROUP must be understood and applied at all levels of the company's organisation, this is why it is the object of several training activities and is posted on all notice boards at the firm's access points. To this purpose, the management of TRATOS S.r.l., TRATOS CAVI S.p.A. & TRATOS HV S.p.A. are committed to pursue a constant enhancement of service and internal organisation based on the definition of targets during periodical System Reviews that help identifying measures aimed at meeting the client's needs and expectations. The correct management of the System obviously implies costs, but this can be considered as an investment, because when the system is not managed correctly, the total costs in the long run are certainly higher. An incorrect management system causes a loss of margin and the worsening of sale prices, with the consequent loss of market shares, the deterioration of the company's image and important psychological impacts compromising the continuance of commercial relationships. TRATOS S.r.l., TRATOS CAVI S.p.A. and TRATOS HV S.p.A. establish with their suppliers a clear relationship of interdependence and cooperation aiming to create value and benefits for both the supplier and the buyer. This implies a proactive exchange of knowledge, as well as the definition of common strategies in order to understand together the needs and expectations of clients and to attain a level of quality on incoming materials that is suitable to meet the clients' requirements and to continue the cooperation with the goal of constant improvement.

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## GOALS OF THE TRATOS GROUP POLICY

Consistently with the previously mentioned guidelines, the Top Management of **TRATOS S.r.l.**, TRATOS CAVI S.p.A. and TRATOS HV S.p.A. have defined the following general goals:

- maintaining a Management System that is compliant with the ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 standards, in order to provide the clients with a primary reference for the quality of products and processes;
- supporting the Management Systems with adequate resources for its operation;
- ensuring the health, safety and protection of people coming into contact with products;
- making sure that suppliers respond timely to the requests for conformity trials;
- updating the TRATOS Supplier Behaviour Code and the terms and conditions for purchase so that they reflect this policy;
- keeping employees informed about environmental aspects and impacts associated with their position;
- maintaining all premises of the Tratos Group free from smoke and verifying that this rule is observed by making internal inspections and taking all necessary measures;
- keeping under suitable control environmental aspects and impacts, taking all necessary actions to prevent pollution issues like the following:
  - leakage of pollutants onto the soil and underground waters;
  - impacts on surface waters and municipal depurators;
  - emissions of pollutants to the atmosphere;
  - production of waste materials, paying special attention to dangerous materials, trying to keep their production as low as possible and promoting an effective re-usage of these products;
- designing a measurement system for quality levels mainly based on indicators that will be periodically assessed in order to define suitable preventive actions. Quality measurement systems shall also be based on internal cases of non-conformity, on clients' complaints and on associated corrective actions;
- **achieve** the constant improvement of the internal organisation based on goals that shall be previously defined by the Management during periodical System Reviews that shall be followed by suitable actions;
- promoting the circulation and understanding of this policy within the company, communicating the clients' requirements and highlighting the importance of professional development of the company's Staff. All this can be achieved if corporate leaders at all levels are able to establish and maintain a work environment that fully commits the Staff to pursue the set quality goals;
- establishing with all suppliers a clear relationship of interdependence and cooperation in order to obtain a level of quality on incoming materials that is suitable to meet the clients' requirements;
- supplying products that are compliant with the applicable national and/or international standards and regulations;
- satisfying the requirements, provisions and expectations of the clients, both those that are expressed explicitly and those that are implicit;
- improving the company's efficiency and profitability;
- adjusting to the constant changes of the domestic and foreign markets;
- introducing safety aspects as an essential part of company management, from the initial definition of new activities to the revision of existing practices;
- achievement of high organisational standards for the Management System dedicated to Safety and Health on the Work Environment, by observing all applicable laws and aiming to the constant improvement of results;
- the whole company's structure (managers, people in charge and employees) must give primary importance to the management of OH&S in order to contribute, each one from his/her position and scope, to the achievement of the assigned safety goals;
- granting at all levels of the company's organisation the full understanding, implementation and preservation of the Safety and Health standards in the work environment;
- the Staff must be involved and committed into the making of the Safety and Health policy for the work environment.

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Like other companies trying to keep a record of Conflict Minerals, an organisation of our size and complexity will need some time to gather all information to understand the extent and implications of the use of Conflict Minerals at TRATOS, and to be able to cater for all interests of our clients.

We can meet these goals by granting the Quality of products, which can be obtained by checking the production cycle from the planning of the whole System to the different stages of manufacturing of products.

## **IMPLEMENTATION OF THE TRATOS GROUP POLICY**

This policy must be known at all functional levels. To this purpose, specific training courses have been attended and will be attended in the future by all employees (at all levels), so that they will have a clear idea of the targets that the Management has set. Also, special documents and internal communications authorised by the Management or by the people in charge of the Management System will be passed to workers in order to meet the set goals. A special organisation has been designated for the implementation of the Policy. This organisation is divided into several hierarchical and functional levels. In order to meet the set goals, **TRATOS S.r.l.**, TRATOS CAVI S.p.A. and TRATOS HV S.p.A. shall use all necessary resources, including external resources if necessary. The Staff of **TRATOS S.r.l.**, TRATOS CAVI S.p.A. and TRATOS HV S.p.A. share the contents and goals of this policy, and are committed to its implementation.

**THE PRESIDENT**  
(Engineer **ALBANO BRAGAGNI**)