



INTEGRATED QUALITY - ENVIRONMENT - SAFETY POLICY

INDEX OF REVISIONS

REV.	DESCRIPTION OF THE CHANGE	DATA
08	Integration AEROSPACE Quality Management System UNI EN 9100	29/01/2025
07	Occupational Safety and Health Integration (ISO 45001)	10/02/2023

Drafted	Verified	Approved
Resp. SGI QASA	D.G.	C.o.A.
Signature AGNELLO ENRICO Date 21/01/2025	Signature DANIELE GAI Date 21/01/2025	Signature GIOVANNI GAI and MARIAGRAZIA GAI Date 21/01/2025



SGI INTEGRATED POLICY

Quality, Environment, Health and Safety

Annex B - MGI

Page 2 of 8

Rev.08 dated 29/01/2025

GAI Giacomo S.r.l., founded in 1967 and still family-owned, is a lathe shop specializing in the production of precision small parts. Backed by a deep-rooted know-how on bar stock removal technologies, it produces precision turned parts, according to customer drawings, with a modern machine park consisting of mechanical and CNC multi-spindle and CNC single-spindle lathes. The macro sectors in which it is active are Automotive, Hydraulics, Aerospace, Medical and Construction. The main customers are first-tier suppliers of European automakers and suppliers of world motorcycle manufacturers and manufacturers of hydraulic and hydraulics systems.

Thanks to the commitment of all its members and external collaborators, GAI Giacomo S.r.l. is recognized as a reliable and competitive company due to the quality of products, reliability of services offered and the ability to identify the needs and expectations of all internal and external stakeholders.

GAI Giacomo S.r.l. considers customer satisfaction, safeguarding and safety of people, environmental protection, information security and Privacy as priorities, has implemented an Integrated Management System according to International Standards:

- UNI EN ISO 9001
- IATF 16949
- UNI EN ISO 14001
- UNI ISO 45001
- UNI EN 9100

As a tool for:

- Maintain and continue to improve the quality standards of products and services made and delivered,
- Ensure safe and healthy working conditions for the prevention of work-related injuries and illnesses,
- employing safe and clean technologies, i.e., with the lowest possible environmental risk and impact, and promoting the continuous improvement of environmental aspects in the provision of products and services to the Customer,
- To safeguard and protect information through the adoption of appropriate technical and organizational measures, from unauthorized or unlawful processing and accidental loss, destruction or damage ("integrity and confidentiality"), in order to enable the achievement of identified objectives.

Mission:

The Mission of GAI Giacomo S.r.l. is to be a financially sound company with good margins to reinvest annually in process improvements and new technologies.

It wants to be a lathe shop known for deep know-how in the area of bar stock removal, a reference for those seeking quality guarantees on parts already produced or customers with prototype ideas they want to try but do not know how to execute.



The Vision:

The company, strongly marked by its approach to continuous improvement, aims to constantly implement:

- investment in technology with the aim of upgrading and replacing the machine fleet, with the goal of regaining profitability on established products and increasing the likelihood of being competitive on new products;
- Implement the search for new Foreign customers with diversification of market sectors and increasing the share of sales from non-automotive customers (e.g., Aerospace, etc.);
- Develop and implement, by the Engineering Department, the approach and application of Lean Manufacturing methodologies to reduce waste, make machine tooling more efficient, optimize inventory management and production scheduling methods;
- 4.0 implementation with regard to use of the scheduler provided on ERP;
- Management of process/machine parameters of lathe with preventive maintenance activity to automatic signaling.
- optimize the use of people, in the areas of Logistics, Warehouse and Administration, by improving their skills to free up resources performing activities on process control;
- Integrate new KPIs representative of processes emerging from Lean Manufacturing activities.

QASA policies:

The General Management of GAI Giacomo S.r.l. constantly strives to concretize Product and Service Quality, Safety of its employees and respect for the Environment at every level of the company, in compliance with the requirements of ISO 9001; ISO 14001; ISO 45001 and UNI EN 9100 Standards and considers them a cardinal principle of its strategy, which is why it places them at the center of its development policies. The increase in the satisfaction of Customers, internal staff and attention to climate change, has fostered the consolidation of a dynamic and efficient as well as effective organizational structure, aimed at promoting its values and tradition; this process has enabled our Company to operate with greater confidence within its Integrated Management System, fostering its increased performance.

Quality, in all its aspects, is the responsibility of every person at GAI Giacomo S.r.l.; this responsibility is not separable from other specific job responsibilities, so it must be developed and concretized through the activities of our company according to the value stream of the processes that take place in it, sustainability, attention to environmental impact and climate change.

GAI Giacomo S.r.l.'s Integrated Management System is based on a risk-based thinking approach that enables the organization to determine the factors that could generate process deviations from the needs and requirements of Stakeholders, and to put in place preventive actions and controls to minimize negative effects and make the most of the opportunities offered by the market by anticipating its trends.

The Executive Board is committed to ensuring that this Policy is understood, shared, implemented and enforced by all its employees and at the same time is committed to sharing it with all stakeholders.



In implementing the Integrated Management System, GAI Giacomo S.r.l. analyzed its context, determined the external and internal factors relevant to its goals and strategic directions, and defined specific objectives, such as:

ISO 9001/ IATF 16949 reference:

- To satisfy its Members/Customers, through the realization of the products and services while maintaining the quality standards defined in agreement between the parties;
- Meet the requirements of current regulations in the matters covered by the system and all requirements, including voluntary commitments, that are specific to the company's business;
- Continuously monitor business objectives to ensure management efficiency and reduction and/or containment of the cost of products and services;
- Constantly monitor the quality of products and services in order to ensure their performance level and pursue continuous improvement, according to the expressed needs of the customer and stakeholders;
- Actively and motivatedly involving the company's workforce in order to achieve the proposed objectives through ongoing training, education and information activities, measuring and verifying the satisfaction of requirements;
- Comply with contractual and specific requirements with individual Clients.

ISO 14001 reference:

- Meet the requirements of current Environmental regulations and all requirements, including voluntary commitments, that are specific to the company's business;
- To define the methods for assessing the significance of Environmental aspects (direct/indirect), their impacts and associated potential risks and also to highlight the situations for which emergency preparedness and response needs to be defined and those subject to operational surveillance and control;
- Ensure Environmental Compliance Obligations "Concession and Permit Management" by describing how they identified, selected, collected, accessed, stored, and continuously updated;
- To increase, for GAI Giacomo S.r.l., the amount of material that can be recovered and recycled, through increasingly effective separate waste collection;
- Reduce the amount of waste and send it to disposal facilities;
- Reduce the environmental impacts provided by significant aspects (e.g., air emissions, soil and subsoil pollution, use of natural and energy resources), with a view to a joint approach with its partners.



ISO 45001 reference:

- Avoid or minimize Health and Safety risks assessed within the work areas under consideration, while respecting the health protection of its employees and the integrity of the external environment;
- Take all necessary measures to prevent the accidental spread of any hazards outside the company's work premises, for all phases of work activities.
- Comply with applicable regulatory obligations and other signed requirements related to identified health and safety hazards
- Promote the culture for safety and health in work environments, further improving the levels of health safety and risk prevention in one's work activities;

EN 9100 reference:

Including the additional specific requirements that address safetyreliability, and seaworthiness that enables GAI Giacomo S.r.l. to:

- Creating Value,
- be included in the worldwide database aerospace industry suppliers OASIS (On Line Aerospace Suppliers Information Systems),
- Access the aerospace market through proper configuration management,
- be able to demonstrate implementation of operational risk management of business processes through the various methodologies (ref. F.M.E.A. AS13004),
- Continuously improve processes that have direct and indirect influence on the quality of products and/or services, keeping them under control through:
 - management and control of the Configuration ,
 - Part Program management,
 - The management of security products,
 - FAI (First Article Inspection) management,
 - The prevention, detection and removal of FOD (Foreign Object Damage) and the management of the related dedicated area,
 - The qualification and validation of its suppliers and the prevention of counterfeit parts being inspected,
 - The issuance of Quality and Compliance certifications according to the IAQG STD 9163 standard.
- Maintain and transfer skills over time through the use of documentation standardized and to the formalization of shared procedures;
- foster active learning through the creation of Working Groups that can develop a virtuous system oriented toward the user and continuous improvement.



In addition, regarding Security and Data Protection and Privacy compliance:

- Ensure the practical implementation of the Company's Data Security and Protection Policy and Privacy compliance by integrating them into the requirements of the Integrated Management System and into related processes, with the aim of meeting the requirements and setting a framework for identifying and managing related objectives;
- Production of products and delivery of services in compliance with the contracts and Service Level Agreements (SLAs) provided;
- Ensure confidentiality, integrity and availability of information throughout the managed processing cycle;
- Ensure adequate logical and physical security in the management of product implementation and service delivery by safeguarding products and related services while countering cybercrime (viruses, network attacks, etc.);
- Ensure high levels of reliability of its information systems in order to minimize potential service unavailability;
- Draft, disseminate, organize, and verify procedures and resources to deal with disaster events and ensure business continuity;
- Promote technological innovation processes in order to counteract the obsolescence of Systems in order to increase the efficiency and security of services;
- Identify and manage risks and opportunities to ensure achievement of goals while minimizing undesirable effects and maximizing positive spillovers.

In addition, GAI Giacomo S.r.l. is committed to the following performance on its products and services provided:

a) compliance and continuity

- obligating itself to carry out the activity of product realization and service delivery with the utmost diligence, professionalism and fairness and in compliance with the mandatory requirements and quantitative and qualitative standards defined by the Clients' Contracts;
- committing to ensure the continuity and regularity of products and services, making use of an organizational structure that enables it to regularly carry out planned actions and from the provision of adequate resources (people, means and equipment);
- pledging to intervene promptly to deal with any dangerous situations or particular user discomfort, upon notification by the competent authorities;
- Committing to promptly respond to Customer complaints and identify the most appropriate actions in resolving critical issues;
- Operating direct monitoring of Customers to assess their degree of satisfaction.



b) direct communication customer - company and stakeholders

In order to allow a constant and direct relationship between Customers and the Company as well as the most complete knowledge of the company organization, GAI Giacomo S.r.l. has set up communication channels that allow information, dialogue with Customers, interaction with interested parties. Through these channels the Organization, undertakes to provide timely information about the products and services provided and to answer questions posed by Customers.

The channels identified for this purpose are:

- The Web Site, as a tool for communication and information to the outside world;
- internally through informational meetings and display within the premises to ensure understanding by all those involved;
- with Customers through the most common communication technologies such as: call conference, video conference

c) information security

GAI Giacomo S.r.l. is committed to maintaining its products and services in full security by ensuring security requirements (confidentiality, integrity, availability, compliance with regulations and laws in force) according to market best practices. The personal data processed by GAI Giacomo S.r.l. are managed in a secure manner ensuring in particular the compliance with the Privacy legislation (GDPR 679/2016), through the adoption of appropriate security measures and ensuring at the same time to these measures an effective implementation.

d) proper behavior of staff

The staff of GAI Giacomo S.r.l. is obliged to operate by observing the provisions of health and safety and environmental protection, to treat Customers with respect and courtesy, to respond to their needs, to facilitate them in exercise of rights and fulfillment of obligations. The Organization also, provides for the selection and training of personnel in contact with the Customer, organizes the participation of such personnel in training courses. With reference to this, the relevant Code of Business Ethics has been defined and formalized.

e) Use of appropriate tools and equipment

GAI Giacomo S.r.l. is committed to keeping the tools and equipment available to the staff product and service realization constantly up-to-date and in good condition of use and safety. In particular, it takes care of the renewal of the vehicle/equipment fleet through investment in technology, maintenance, short-term depreciation policies. They also undertake to organize staff participation in training courses on the use of equipment and PPE.

f) access to appropriate workplaces

The GAI Giacomo S.r.l. is committed to constantly maintain safe, in good condition the buildings he spaces usable by internal staff in the performance of work activities and external personnel (suppliers or visitors) who interface with the Company. In particular, it takes care of maintenance, periodic cleaning, extraordinary cleaning and carry out identified interventions/improvements.



SGI INTEGRATED POLICY

Quality, Environment, Health and Safety

Annex B - MGI

Page 8 of 8

Rev.08 dated 29/01/2025

GAI Giacomo S.r.l., strong in its historicity, knows that to consolidate and improve its achievements, professionally prepared, trained and personally motivated people are needed to ensure:

- Collaboration and participation at all levels of the company: at all times of work, improved ideas and proposals to reduce costs and simplify work should be favored;
- Development of information and participation at all company levels;
- Promotion a sense of responsibility, productivity, self-control and efficiency;
- Awareness of the Quality and Environmental Policies and relevant objectives, the implications of not complying with the requirements of the integrated management system including failure to meet compliance obligations, significant environmental aspects and related actual or potential environmental impacts associated with their work activities;
- Consideration of each individual and his or her contribution to the effectiveness of the management system, including the benefits of improved performance;
- Honesty and constructive spirit in problem solving;
- Compliance with safety regulations and work environment;
- Sharing and Compliance with the Code of Business Ethics.
- Sharing success.

Objectives:

- To improve with constancy and continuity the Organization model we have developed and kept active, starting from the needs of the Client and those of the market, defining preventive or improvement actions annually by involving its structures and measuring their achievement,
- product quality and efficiency,
- Ensuring that we meet our customers' needs and produce products of a high quality standard
- Ensure that the training needs of Staff are met, helping them to develop their full potential, both in individual and group work, avoiding demotivation phenomena;
- Comply with mandatory regulations.
- Positively involving suppliers as an important link in the supply chain
- Ensure that environmental laws and regulations in addition to adopted voluntary standards are implemented, enforced and adhered to;
- Pursue pollution prevention by consolidating good operating practices, adopting when possible the best available technological solutions, improving plant reliability and plant maintenance, within the scope of the objectives described in the Environmental Improvement Plan following the Management System Review;
- Ensure the continuous improvement of its environmental performance through actions and controls on the main environmental aspects of the site and in particular the consumption of products and chemicals, water, electricity, diesel fuel for motor vehicles; water discharges, air and noise emissions, waste generation and soil protection;



SGI INTEGRATED POLICY

Quality, Environment, Health and Safety

Annex B - MGI

Page9 of 8

Rev.08 dated 29/01/2025

The Integrated Management System serves as the backbone of the company as a tool to manage, measure, and evaluate itself in order to continuously improve. continuous improvement requires the involvement and participation of everyone.

The objectives described in this document are detailed in the structural framework of the Improvement Plan in timelines and responsibilities are defined. They translate the Policies into concrete activities year by year.

These activities are implemented by all functions within the scope of their responsibilities and reviewed periodically by the Executive Board in order to ensure continuous improvement of the products and services produced, safety and environmental performance.

Goals are managed and kept under control by the General Management regarding the development and achievement of goals.

This Integrated Policy is consistent with the company's Code of Ethics.

Any deviation from this Policy and the Code of Ethics is not recognized as Management's will and is subject to investigation and possible disciplinary action.

The General Management of GAI Giacomo S.r.l.

GAI John

GAI Mary Grace