

Document Management

Guidelines for the Tecniplast Group

Code:	ESG/GDL03EN
Version:	01.00
Validity date:	21.02.25
Classification:	Public
Type:	Guideline

	<i>Issuance</i>	<i>Validation</i>	<i>Approval</i>
Role	Group Sust. Director	Sust. Committee (SC)	Sust. Committee (SC)
Name	Roberto Crippa	On behalf of the SC	On behalf of the SC
Signature	(signed in original)	Franca Ponti (signed in original)	Alessandro Bernardini (signed in original)

Glossary and Acronyms

The following definitions, acronyms or abbreviations are used in this document:

Issuance, Validation, Approval Cycle

A formal process that drives the lifecycle of a document, from its writing to its entry into force.

Issuing company

The company in charge of the issuance, validation and approval cycle for the concerned documents.

TSPA

Tecniplast SpA. The Tecniplast Group's parent company.

References / Riferimenti

A number enclosed between square brackets [n] in the text refers to the following information sources

- [1] "Sustainability Framework", Tecniplast, ESG/GEP01

Table of Contents

1	Purpose, Scope, Addressees	4
1.1	Purpose	4
1.2	Scope	4
1.3	Addressees	4
2	Introduction	4
3	Overarching Guidelines	5
3.1	General Principles	5
3.2	Document Classification	5
3.3	Document Dissemination	5
3.4	Information Transfer	6
3.5	Conservation and Destruction	6
4	Sustainability-related Guidelines	7
4.1	Actors	7
5	Sanctioning Mechanisms	8

1 Purpose, Scope, Addressees

1.1 Purpose

The purpose of these guidelines is to define the classification, the document management methods and related accountabilities entailing the documents managed by the concerned issuing companies.

1.2 Scope

These guidelines apply to all the above documents and to the management of information contained therein.

1.3 Addressees

These guidelines are addressed to all actors in document management:

- Individuals listed in the issuance, validation, and approval cycle.
- Subjects on the distribution list.
- Anyone who has been authorized to access the concerned documents.

2 Introduction

Document management and the information contained therein is a cornerstone of governance, as:

- Provides information aimed to direct desired behaviors and prevent unwanted ones.
- Ensures the appropriate protection of confidential information, reducing the risks deriving from inappropriate or unconscious management.

These guidelines set general management criteria, without prescribing technical methods for their implementation.

Concerned Tecniplast Group companies will adopt the appropriate technical methods depending on the specific situations, always in compliance with the here below general principles.

3 Overarching Guidelines

3.1 General Principles

Document management shall be set up in compliance with the following general principles:

Confidentiality

Guarantee the information privacy by restricting access to concerned documents through appropriate security measures (e.g. encryption, authentication).

Accessibility

Ensure access to information only to authorized addressees.

Integrity

Ensure information accuracy and reliability.

3.2 Document Classification

Each document shall be characterized by a classification code:

PUB -Public

Documents whose disclosure does not generate (potential) negative impacts to the Tecniplast Group and which, by their nature, can be made public.

As such, these documents do not require security measures to protect their confidentiality, but nevertheless require updating to guarantee their integrity.

RES -Restricted

Documents whose unauthorized dissemination outside the Organization and without appropriate security measures may cause significant consequences to the interests of the Tecniplast Group.

SCR -Strictly Restricted

Documents whose unauthorized dissemination (both inside and outside the Organization) and without due security measures may cause significant damage to the interests of the Tecniplast Group.

Remarks

1. In case that, by mistake, a document has remained unclassified, it is to be deemed as "RES -Restricted". It must promptly be classified according to its nature and content.

3.3 Document Dissemination

Two cases are given:

Dissemination within the company

- The issuing company defines the distribution methods in compliance with the principles of confidentiality, accessibility, and integrity.
- The document issuer shall assess its classification and the consequent distribution list to the previously identified and authorized addressees.

Dissemination outside the company

- The issuing company defines the distribution methods in compliance with the principles of confidentiality, accessibility, and integrity.
- The document issuer shall assess its classification and the consequent distribution list to the previously identified, authorized, and bound by appropriate confidentiality covenants, addressees (e.g. Non-Disclosure Agreement).
- The document issuer shall highlight to the concerned recipients the document classification and the related criteria entailing information management to be followed by them.

3.4 Information Transfer

Two cases are given:

Written Transfer

To protect the written transfer of information contained in restricted or strictly restricted documents, concerned actors:

- Shall not transfer concerned documents to anyone other than the addressees set in the distribution list.
- Shall only use methods and tools prescribed by the issuing company and/or such as to preserve confidentiality, accessibility and integrity of the information contained in the concerned documents.

Oral Transfer

To protect the oral transfer of information contained in confidential or strictly confidential documents, concerned actors:

- Shall not have confidential conversations in public places or on unsafe communication channels to prevent information access by unauthorized individuals.
- Shall not leave messages containing confidential or strictly confidential information on answering machines or voice messages, as they can be reproduced by unauthorized individuals, stored on commonly used systems, or incorrectly stored.
- Shall be authorized at the appropriate level to listen to a conversation.
- Shall ensure that appropriate controls are implemented in the room (e.g. soundproofing, closed doors).
- Shall initiate any sensitive conversations by informing those present about the information classification and any treatment requirements of what they are about to hear.

3.5 Conservation and Destruction

The following guidelines apply:

- Documents shall be appropriately saved and kept in places where access is permitted only to authorized personnel (e.g. application systems, network folders with access only to authorized personnel, locked cabinets with limited access for paper documentation).
- Paper documentation shall not be left unattended, therefore complying with clear desk and clear screen rules.
- In case of disposal of equipment containing strictly confidential information, it is recommended to proceed with multi-level cancellation and/or destruction of the

concerned device in order to ensure the illegibility of the information contained therein.

- Paper documentation shall be made non-recoverable by means of document shredders.

4 Sustainability-related Guidelines

In addition to what presented in Chapter “Overarching guidelines”, this chapter provides guidelines that apply to all documents being part of the Sustainability Framework [1].

4.1 Actors

Group Sustainability Director

The Group Sustainability Director is accountable for:

- Defining, for central documents classified as "RES -Restricted" and "SCR -Strictly Restricted", the distribution list, after consultation and approval by the Sustainability Committee.
- Keeping updated the distribution list of central documents classified as "RES -Restricted" and "SCR -Strictly Restricted".
- Notifying the distribution list to the TSPA General Affairs Department.
- Keeping concerned documents updated and transmitting paper originals, versions in editable electronic format and true copies to the TSPA General Affairs Department.
- Disseminating concerned documents to the addresses on the distribution list, as well as to the Local Document Manager (see hereinafter).

Local Sustainability Team Leaders

Local Sustainability Team Leaders are accountable for:

- Appointing a Local Document Manager, who is in charge of storing concerned documents in an electronic and paper archive.
The aforementioned Local document Manager shall be notified to the TSPA General Affairs Department.
- Defining, for local documents classified as "RES -Restricted" and "SCR -Strictly Restricted", the distribution list, after consultation and approval by the concerned Central Sustainability Team.
- For local documents, notifying the distribution list to the Local Document Manager.

Local Document Managers

Local Document Managers are accountable for:

- Defining the physical location where concerned documents in electronic and paper format are stored.
- Keeping updated the distribution list of local documents classified as "RES -Restricted" and "SCR -Strictly Restricted".
- Notifying the aforementioned list to the TSPA General Affairs Department.
- Disseminating local documents to concerned addressees, as well as to the TSPA General Affairs Department.
- Keeping updated concerned document archives (see above).

TSPA General Affairs Department

The TSPA General Affairs Department is accountable for:

- Defining the physical location where concerned documents in electronic and paper format are stored.
- Keeping updated concerned document archives (see above).

Addressees

The following are deemed as addressees:

- Individuals listed in the issuance, validation, and approval cycle.
- Subjects on the distribution list.
- Anyone who has been authorized to access the concerned documents.

Addressees shall:

- Comply with the conduct rules related to the concerned document classification.
- Comply with the aforementioned information transfer rules.
- Comply with the aforementioned conservation and destruction rules.

5 Sanctioning Mechanisms

- Failure to comply with the principles indicated in this guideline may lead to serious repercussions on the Tecniplast Group, which therefore reserves the right to apply disciplinary measures in accordance with the current provisions of law and/or the applicable National Collective Bargaining Agreement.
- For external coworkers and Third Parties, infringements will constitute a serious contractual breach, potentially leading to the termination of the contract itself.
- Behaviors that constitute a violation of this guideline may, at the same time, also violate legal provisions such as to entail civil and criminal consequences for the concerned addressees.

The Company reserves the right, in the event of a confirmed violation by an addressee, to suspend, block or limit access to the information, as well as to request the non-compliant addressee to compensate for damages resulting from violations of these guidelines.

END OF THE DOCUMENT / FINE DEL DOCUMENTO

(This page intentionally left blank) / (pagina intenzionalmente vuota)
