

## INTEGRATED MANAGEMENT SYSTEM POLICY

### VISION

Be the safest, most reliable, and most professional air cargo service provider. Create an organisation aimed at continuously improving Health and Safety performance for its workers and preventing corruption.

Consistent with the provisions of the Code of Ethics and the integrated policy of the Parent Company Poste Italiane, approved by the Board of Directors ("BoD") of Poste Air Cargo ("Organisation") on 21/10/2021, continuously improve an **Integrated Management System - Quality, Health, and Safety in the Workplace and Prevention of Corruption** ("IMS") complying with UNI EN ISO 9001, UNI ISO 45001, and UNI ISO 37001, in particular adequate, suitable, and effective at preventing crimes that could take the form of potential and/or actual corruption crimes.

### MISSION

Create favourable conditions to effectively provide the Organisation's services to achieve the vision's objectives by applying quality principles, risk prevention, and protection measures for its workers and controls to prevent corruption, guaranteeing the safety of operations, the airworthiness of the aircraft employed, the maintenance of adequate Health and Safety conditions for its workers, and the performance of activities in such a way as to prevent any corruption whatsoever, and therefore undertaking to:

- continuously comply with applicable regulatory requirements, including legislative and other signed requirements relating to occupational health and safety and anti-corruption;
- prohibit any act of corruption, meet the requirements and continuously improve performance in preventing corruption under the Integrated Management System;
- encourage the reporting of suspicions based on a reasonable belief that acts of corruption involving the Organisation have been committed, without fear of discrimination or any other type of retaliation, by regulating the process through specific procedures;
- ensure that the Anti-Corruption Compliance Function has the appropriate resources, skills, status, authority, and independence to perform its role of overseeing the design and implementation of the system, advise staff on anti-corruption matters, ensure compliance with ISO 37001, and report to the Board of Directors and the Chief Executive Officer on corruption prevention performance;
- reduce the number of occupational accidents and illnesses for their staff.

The vision and mission of the organisation's management focus on four fundamental elements:

1. CUSTOMERS. Providing services promptly and reliably in a market such as air transport, which is complex and regulated, while meeting customer requirements.
2. HUMAN RESOURCES. Seeking and retaining people who are capable, motivated, and aware of the occupational health and safety risks of their jobs and of the importance of adopting behaviour in line with the company and group principles on anti-corruption, including those set out in the Organisation, Management, and Control Model pursuant to Italian Legislative Decree no. 231/2001, which exclude any act at risk of corruption crimes being committed, enhancing individual efforts to achieve business, occupational health and safety, and corruption prevention objectives.

Consistent with the provisions of the Code of Ethics and the Integrated Policy document of the Parent Company Poste Italiane, the Organisation specifically prohibits its staff from:

- accepting the request for, authorising someone to accept, or soliciting, directly or indirectly, a payment or a financial advantage, other utility, or benefit from public or private parties;
- offering, promising, giving, paying, or authorising someone to give or pay, directly or indirectly, money, other financial advantage, utility, or benefit of any kind to public or private persons;
- receiving or obtaining the promise of money or other benefits for themselves or for others in order to perform or omit acts in breach of the obligations inherent to their office or the obligations of loyalty, also causing damage to the companies themselves;
- promising or paying sums, goods in kind, or other benefits to stakeholder associations to promote or favour the interests of the Organisation.

Regarding behavioural measures, in this Policy:

- the specific principles defined in the Code of Ethics and in the Integrated Policy of the Parent Company Poste Italiane approved by the Board of Directors on 21/10/2021 are fully implemented;
  - the provisions of Special Part A of the Organisation, Management, and Control Model of the Organisation drafted pursuant to Italian Legislative Decree No. 231/2001 are deemed fully confirmed.
3. SHAREHOLDERS. Making the value of the business visible through the involvement of everyone, with the goal of continuously improving the Organisation's performance.

4. BUSINESS PARTNERS: Basing commercial, supply, partnership, and collaboration relationships on principles of legality, transparency, and preventing any act of corruption.

Management deems that the use of an Integrated Management System - Quality, Health, and Safety at Work and Prevention of Corruption allows for greater control of the business conducted by the Organisation, the risks to health and safety at work and corruption related to them, while also giving everyone certainty of their own and others' competence, responsibilities, and behavioural obligations. It is therefore a method with which one can think of growing on concrete foundations and in compliance with the principles of legality and fairness, a method that guarantees the Organisation's professionalism, attention to the health and safety conditions of its workers, customer satisfaction, and the prevention of corruption. For these reasons, Management prepares activity management documents that it undertakes to make common assets of the entire organisation, also through the involvement of all employees, collaborators and, as far as applicable, business partners.

Management periodically defines, updates, and monitors the objectives to be achieved using the tools provided by the Integrated Management System. In addition, methods have been defined to identify objectives, plan the activities necessary to achieve them, and monitor the results achieved.

The monitoring of the progress of what has been planned and the degree to which the objectives have been achieved is analysed annually in the Management Review of the Integrated Management System, in periodic safety or progress meetings attended by management and workers' safety representatives, and in information and awareness-raising actions for personnel aimed at creating the necessary awareness of the importance of the company's ethical principles and the possible consequences in the event of non-compliance in preventing corruption.

The Chief Executive Officer of the Organisation has identified the Operational and Legal Support function as being in charge of the Integrated Management System, delegating to it the operational aspects of the Integrated Management System aimed at:

- implementing the Integrated Management System Policy;
- promoting and achieving the objectives set;
- disseminating, increasing the knowledge of, and implementing procedures;
- continuously improving the Integrated Management System;

and as the Corruption Prevention Compliance Function, giving it the necessary authority and independence to:

- coordinate the initial design and implementation of the corruption prevention part of the Integrated Management System;
- ensure, in liaison with the competent functions of the Poste Italiane Group, the activities relating to compliance for preventing corruption with the aim of guaranteeing — by virtue of the role, skills, and independence in performing the functions assigned — that the management elements for preventing corruption set forth by the Organisation's Integrated Management System comply with the reference requirements and standards;
- guarantee, in liaison with the competent functions of the Parent Company Poste Italiane and with the organisational units of the Organisation, the supervision and monitoring of the elements of the Management System for the Prevention of Corruption, favouring integration with the other management systems in place;
- provide support at all organisational levels for the proper implementation of the management elements for preventing corruption so that they are applied accordingly;
- report to the BoD and CEO on the progress of performance related to preventing corruption during the periodic management review;
- contact the BoD and CEO at any time and in a timely manner so that they can be informed directly and promptly in the event of significant anti-corruption incidents within the organisation or involving suppliers in critical business.

Violation of the principles laid down in this policy and, in general, of the requirements for preventing corruption laid down in the Integrated Management System may lead to legal action being taken, as well as the adoption of measures, against the recipients, in accordance with the provisions of the law and the contractual regimes.

Rome, 27/09/2022

*The Chief Executive Officer*