

INTEGRATED MANAGEMENT SYSTEM POLICY (IMS)

PURPOSE, MISSION, VISION & VALUES – *Proud to make YOUR ideas work*

PURPOSE: We turn complex visions into tangible realities through power electronics and full-custom embedded industrial control systems. We go beyond mere manufacturing; we aim to generate ethical value by reducing our environmental impact and committing to the continuous improvement of our performance through more responsible, transparent, and measurable production practices.

VISION: We look to the future with the ambition of being the benchmark technology partner for global OEMs driving the most challenging markets, integrating Ecodesign principles into every stage of the product lifecycle to reduce environmental impacts, optimize energy efficiency, and increase the circularity of our electronic solutions.

MISSION: We translate our values into action by providing end-to-end electronic solutions that successfully combine reliability, competitiveness, and rapid industrialization. The secret of our approach lies in the DOTS (Dedicated Off The Shelf) model, which enables us to design high-performance products built to last. At every stage of the process, from concept to production, we integrate the highest ESG criteria to optimize resource use and ensure responsible governance.

OUR VALUES



TECHNOLOGY & INNOVATION



PASSION & DEDICATION



DIALOGUE & SOLUTIONS



**SOCIAL & ENVIRONMENTAL
RESPONSIBILITY**

Stakeholder message

At Prima Electro, we turn technological complexity into industrial value. We do this every day by putting expertise, methodology, and vision at the service of critical systems operating across diverse application markets.

Our identity is defined not by the time spent on the market, but by our capacity to evolve. We have transitioned from being design specialists to a global partner capable of managing the entire product lifecycle: from concept to validation, and from production to long-term support.

"Proud to make YOUR ideas work" is not a slogan, but an operational commitment toward our clients and partners.

Our model is founded on an integrated vision: research and development, industrialization, manufacturing, and testing work in synergy with a single objective – ensuring reliable, robust, and durable solutions. Quality is not a phase of the process; it is the process itself.

Along this path, sustainability is not an accessory topic, but a structural responsibility. Designing products built to operate in challenging environments for decades means reducing waste, optimizing resources, and contributing concretely to the resilience of the systems into which we are integrated. Reliability is our primary form of respect for the environment and future generations.

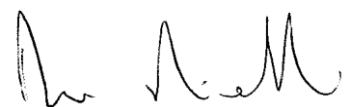
For Prima Electro, growth is a balance between economic performance, technological innovation, and human value. For this reason, Management has adopted an Integrated Management System that rigorously governs quality, health and safety, environmental protection, information security, and business ethics.

Not as a formal compliance exercise, but as an organizational architecture that supports consistent, transparent, and measurable decisions.

This Policy represents our commitment to all of you – clients, employees, partners, suppliers, and the community. It is the pact that guides our daily operations, ensuring that the electronics we develop today contribute responsibly to the strategic systems of tomorrow.

Let us continue to innovate. With method. With integrity. With responsibility.

Moncalieri, 01/03/2026



Davide Peiretti
General Manager

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1. QUALITY

Prima Electro considers Quality a foundational value and a systematic commitment to the reliability, safety, and robustness of the products it designs and manufactures.

We operate in complex industrial contexts, often characterized by severe environmental conditions and particularly high performance requirements. For this reason, we adopt a rigorous and structured approach that integrates design, industrialization, manufacturing, and testing, ensuring full control over every stage of the product lifecycle.

Our mission is to support our clients' technological evolution through industrial-grade solutions designed to ensure operational continuity, durability, and performance over time. To translate this commitment into concrete results and support responsible and sustainable growth, Management is committed to pursuing the following core principles:

Sales & Profitability: Value and Strategic Partnership

We are committed to strengthening and consolidating our competitive positioning through balanced and sustainable growth in revenues and profitability, consistent with responsible business management and oriented toward the long term. Our strategy is founded on the development of solid partnerships with premier clients, to whom we offer integrated value chain management, overseeing in a structured manner all phases of the product lifecycle – from design to validation, and from manufacturing to long-term support.

Through this organizational model, we ensure process control, qualitative consistency, and operational risk mitigation, providing customized solutions capable of ensuring reliability and performance in the most complex and challenging application contexts.

R&D: Innovation and Strategic Focus

The multidisciplinary know-how of our R&D team is the core of our competitiveness: we direct our resources toward projects of high strategic value following the proprietary DOTS (Dedicated-Off-The-Shelf) business model, which combines customization with industrial standards.

The DOTS model makes it possible to develop custom solutions, designed to meet the specific requirements of the client while maintaining the robustness and reliability characteristics typical of industrial-grade products. This approach ensures high levels of performance, technical risk control, and industrial sustainability in the medium to long term.

We collaborate in a structured manner with universities, centers of excellence for research, and industrial associations, fostering an innovation ecosystem that allows us to master key technological fields, ensuring continuous skills updating and the maintenance of technological leadership.

Lean Company: Operational Excellence

We systematically pursue the optimization of business processes through the application of Lean principles, with the objective of improving operational efficiency and ensuring stable, controlled production flows. The vertical integration of processes enables us to exercise direct oversight over the critical phases of the value chain, fostering greater market responsiveness and structured cost management.

Continuous improvement is supported by a system of constant performance monitoring through Key Performance Indicators (KPIs), which allow for the timely control of variances, the proactive management of operational risks, and the maintenance of high standards of quality, safety, and reliability.

Quality: Reliability and Compliance

Quality for Prima Electro is expressed in the ability to guarantee reliability and operational continuity throughout the entire product lifecycle. We ensure qualified support during the commissioning phase and throughout operation, both on-site and remotely, through structured processes, technical traceability, and consolidated specialized expertise.

Our Quality Management System, compliant with the ISO 9001 standard, ensures systematic process control, a risk-based approach, and the continuous improvement of performance. This organizational model enables us to preserve the safety, performance, and compliance of installed solutions over time, strengthening trust relationships and lasting partnerships with our clients.

Sustainability

Integrating sustainability into our industrial model means making a concrete commitment to environmental protection, resource efficiency, and the reduction of impacts throughout the entire product lifecycle. We address environmental challenges as drivers of innovation and continuous improvement, while promoting a corporate culture founded on responsibility, the enhancement of skills, and talent development. In this way, we ensure that the design and organizational choices adopted today help define increasingly advanced, responsible, and sustainable standards for the future.

2. ENVIRONMENT

Prima Electro considers environmental protection an integral part of its Integrated Management System, guiding processes and decisions toward the prevention and reduction of environmental impacts throughout the entire product lifecycle.

Ecodesign guides Research and Development activities: we integrate environmental requirements from the design phase, favoring low-impact components, durable solutions, and architectures oriented toward reparability and the extension of useful life, in consistency with the principles of the circular economy and sustainable procurement criteria.

In compliance with the ISO 14001 standard, we are committed to the continuous improvement of environmental performance, pollution prevention, and full compliance with applicable compliance obligations.

Environmental Protection and Pollution Prevention

We are committed to preventing and reducing environmental impacts through the structured control of manufacturing processes, including electronic board production, system assembly, and testing activities. We ensure the responsible management of hazardous substances, the proper treatment and disposal of waste, and the protection of soil and water resources across all operational sites.

Energy Efficiency and Greenhouse Gas (GHG) Emission Reduction

Aware of the energy impact of our activities, we adopt a systematic approach to monitoring and progressively reducing greenhouse gas (GHG) emissions, integrating these objectives into operational planning and corporate investments.

To this end, we promote:

- the optimization of electricity consumption in manufacturing processes;
- the adoption of systems, machinery, and technologies characterized by high energy efficiency and reduced environmental impact.

Eco-design and Product Lifecycle

Environmental aspects are integrated into Research and Development activities and represent a design criterion for our solutions, with the objective of reducing impacts throughout the entire product lifecycle. In particular, we are committed to:

- **Reducing impact during the use phase** by developing hardware and firmware oriented toward the maximum energy efficiency of the systems in which they are integrated;
- **Responsibly managing end-of-life**, promoting design oriented toward reparability, upgradeability, and durability, in order to limit the generation of electronic waste (WEEE) and facilitate component recovery and treatment activities.

Sustainable Resource Management

We adopt an approach oriented toward resource efficiency, integrating Lean principles also into the management of environmental aspects. We promote the systematic reduction of raw material waste, the optimization of packaging, and the reuse and recycling of materials, where technically and economically sustainable.

Legislative Compliance and Transparency

We guarantee full compliance with applicable environmental legislation and reference directives/regulations, including REACH and RoHS, through constant monitoring of compliance obligations.

We ensure transparency toward stakeholders and pursue the continuous improvement of our sustainability performance, including through recognized assessment systems, supported by documentary evidence and measurable indicators.

3. HEALTH AND SAFETY

Prima Electro recognizes health and safety protection as a fundamental principle and a shared responsibility at all levels of the organization. In consistency with the corporate Code of Ethics, we guarantee working conditions that respect human dignity and comply with the highest safety standards. Health and safety management is integrated into our Management System and is founded on a structured approach to prevention, risk assessment, and control, with particular attention to manufacturing activities, R&D laboratories, and on-site technical operations.

Every employee, collaborator, and partner is called upon to actively contribute to maintaining a safe working environment, in compliance with the procedures and prevention measures adopted, reinforcing a corporate culture oriented toward responsibility, awareness, and prevention.

In compliance with current legislation (Legislative Decree 81/08 and subsequent amendments) and in consistency with the principles of the ISO 45001 standard, we are committed to ensuring the following.

Safe and Healthy Working Conditions

Safe and healthy working environments, oriented toward the prevention of occupational injuries and illnesses, through a systematic approach to risk assessment and control.

Particular attention is dedicated to production departments and laboratories, where risks of an electrical and chemical nature, as well as those associated with manual material handling, are subject to continuous analysis, structured prevention measures, and improvement actions aimed at hazard elimination and the reduction of residual risks.

Continuous Improvement and Performance

We consider health and safety a dynamic process, founded on the principle of continuous improvement. Through the systematic analysis of injuries, near-misses, and performance indicators (KPIs), we evaluate the effectiveness of the measures adopted and define targeted corrective and preventive actions.

The constant upgrading of systems, equipment, and technologies in production departments and R&D laboratories represents an integral part of this commitment, with the objective of reducing risks, increasing protection levels, and consolidating our safety performance over time.

Consultation, Participation, and Training

We recognize that health and safety represent a shared responsibility and actively promote the consultation and participation of workers and their representatives (Workers' Safety Representatives - RLS), encouraging the reporting of risk situations and contributions to the improvement of the management system. Concurrently, we invest in continuous training and instruction to ensure awareness of specific risks and strengthen the active role of every collaborator in protecting their own safety and that of others.

Integration with Business Strategy

Health and safety are integrated into the corporate strategy and the "Lean Company" organizational model. Process optimization, the standardization of activities, and the maintenance of orderly and structured work environments contribute not only to operational efficiency but also to risk reduction, the prevention of human error, and the containment of accidents.

4. ANTI-CORRUPTION

Prima Electro bases its activities on the principles of loyalty, fairness, transparency, and integrity, operating in full compliance with applicable regulations and professional ethics rules. The company does not tolerate any form of corruption, active or passive, nor behaviors aimed at obtaining undue advantages in either the public or private sphere.

We are committed to maintaining high ethical standards and ensuring full compliance with current anti-corruption and anti-extortion regulations in the countries where we operate, including the provisions of Legislative Decree 231/2001 and other applicable laws. Offering, promising, requesting, or accepting bribes or other undue benefits is strictly prohibited; such behaviors, in addition to being contrary to our principles, may expose the company and the individuals responsible to significant penalizing consequences.

Zero Tolerance for Corruption

It is strictly prohibited to engage, directly or indirectly, in any conduct involving the offer, promise, payment, or acceptance of money or other benefits—such as gifts, favors, professional opportunities, or advantages of any kind—aimed at improperly influencing decisions or obtaining illicit benefits.

Relations with the Public Administration

In relations with the Public Administration, public officials, and regulatory authorities, Prima Electro operates in strict compliance with the law and the principles of fairness and transparency. Every interaction must be documented, traceable, and based on complete and truthful information, excluding any form of pressure or improper influence.

Transparency in Private-to-Private Relations

Prima Electro promotes principles of fair competition and integrity in relations between economic operators. Any form of private-to-private corruption or unethical practice aimed at altering market dynamics or obtaining undue contractual advantages is prohibited.

Management of Gifts and Hospitality

In consistency with the Organization, Management and Control Model pursuant to Legislative Decree 231/01, gifts and representation expenses are permitted exclusively if of modest value, compliant with corporate practices, and adequately authorized and tracked. Under no circumstances may such initiatives be interpreted as instruments aimed at influencing decisions or obtaining improper advantages.

Third-Party Due Diligence

The selection of suppliers, consultants, and commercial partners is based on objective criteria of competence, reliability, and integrity. Prima Electro requires adherence to the principles of the Code of Ethics and the Organization, Management and Control Model pursuant to Legislative Decree 231/01, conducting appropriate verifications and monitoring to prevent the risk of corrupt practices along the value chain.

Whistleblowing and Reporting

In consistency with Model 231 and applicable legislation, Prima Electro provides secure and confidential reporting channels to communicate suspected violations or non-compliant behaviors. The protection of the reporting person from any form of retaliation, discrimination, or penalization is guaranteed.

Monitoring and Supervisory Body

The implementation of this Policy is entrusted to the Supervisory Body (Organismo di Vigilanza - OdV), which is responsible for supervising the effectiveness and observance of Model 231, as well as verifying the constant updating and correct application of internal procedures.

5. INFORMATION SECURITY

This Policy defines the principles and objectives for information security management at Prima Electro, ensuring the protection of the integrity, confidentiality, and availability of corporate information assets.

The Information Security Management System is structured in compliance with the ISO/IEC 27001:2022 standard and takes into account applicable regulations on cybersecurity and digital resilience, including European provisions such as the NIS2 Directive, where applicable. The objective is to protect information assets in support of operational continuity, data protection, and the achievement of strategic corporate goals.

5.1. Scope

This Policy applies to:

- All employees, collaborators, suppliers, partners, and third parties who access, process, or manage corporate information in any format (digital, paper, or other).
- All corporate information, processing locations, processes, information systems, devices, and networks

5.2. Definition of Information Security

At Prima Electro, information security is understood as the coordinated set of organizational, technical, and procedural measures aimed at protecting corporate data, regardless of the format or medium on which they are stored or processed, ensuring the following fundamental principles:

- **Confidentiality:** Information is accessible exclusively to authorized parties, preventing unauthorized access, use, or disclosure.

- **Integrity:** Information is accurate, complete, and protected against unauthorized modifications, ensuring its reliability and correctness over time.
- **Availability:** Information and the systems that process it are accessible in a timely manner, in consistency with operational requirements and business continuity.
- **Traceability:** Activities relevant to security—including data access, modifications, processing, and transfers—are recorded and verifiable, supporting accountability, security event management, and compliance with applicable regulatory requirements.

5.3. Information Security Objectives

Prima Electro is committed to pursuing the following objectives regarding information security:

- Inventory and classify information based on the level of criticality regarding confidentiality, integrity, and availability;
- Protect the information assets from internal and external threats assessment-based approach;
- Ensure compliance with applicable regulations, standards, contractual obligations, and rules;
- Define clear roles, responsibilities, and authorities in information security management;
- Promote staff awareness and continuous training, strengthening the corporate security culture;
- Prevent, detect, and manage security incidents, ensuring a timely response and business resumption;
- Ensure business continuity even in emergency or crisis situations;
- Protect technological assets, infrastructures, and systems supporting information processing;
- Protect communication channels and data during transmission phases;
- Ensure traceability and monitoring of security-relevant activities;
- Develop and maintain processes consistent with recognized standards and industry best practices;
- Protect the information of customers and stakeholders, demonstrating corporate commitment through appropriate control tools and, where appropriate, certifications;
- Collaborate with customers in managing security risks, providing documentary and operational support for threat prevention.

5.4. Management Principles

The achievement of information security objectives is based on the following principles:

- Ensure compliance with laws and regulations applicable to information security and personal data protection, including Regulation (EU) 2016/679 (GDPR) and reference national regulations;
- Adopt a systematic approach based on risk assessment and management;
- Implement, maintain, and update an Information Security Management System (ISMS) compliant with the ISO/IEC 27001:2022 standard;
- Continuously monitor and improve the effectiveness of security controls and processes;
- Ensure collaboration and coordination with internal and external stakeholders in incident management and the mitigation of related impacts.

5.5. Responsibilities

Within Prima Electro, responsibilities for information security are assigned as follows:

- **Management:** Approves the Information Security Policy, ensures the necessary strategic direction and provides adequate resources, promoting a corporate culture oriented toward security and shared responsibility.
- **Head of ICT:** Ensures alignment between the information security strategy, IT governance, and business objectives, supervising the activities of the Information Security Manager and approving strategic decisions in the security domain.
- **Information Security Manager:** Is responsible for defining, implementing, and maintaining the Information Security Management System (ISMS), coordinating security initiatives, managing incidents, and ensuring compliance with applicable policies, standards, and regulations.
- **Function or Service Managers:** Implement and monitor security measures in their respective areas of competence, ensuring compliance with corporate policies and collaboration in risk management.
- **Employees and Collaborators:** Are required to comply with security policies and procedures, adopting responsible behaviors and promptly reporting any incidents or vulnerabilities.
- **Suppliers and Third Parties:** Must comply with security requirements set forth in contractual agreements, ensuring that their activities do not compromise the protection of corporate information and promptly reporting any anomalies or breaches.

Applicable Requirements

Prima Electro is committed to complying with all laws, regulations, and other mandatory requirements regarding information security, including those relating to personal data protection, intellectual property rights, and contractual obligations assumed toward customers, stakeholders, and other interested parties.

Management Commitment

Management actively supports the adoption and implementation of this Policy, ensuring the necessary resources and promoting the continuous improvement of the Information Security Management System through periodic reviews of policies, controls, and the effectiveness of the measures adopted.

Management of Exemptions and Exceptions

Any exemptions or deviations from this Policy are permitted exclusively in extraordinary cases and subject to formal Management approval. Such exceptions must be adequately justified, documented, and subjected to periodic review to verify the persistence of the conditions that justified their authorization.

Compliance

This Policy is adopted by Prima Electro and kept constantly aligned with applicable legislative, regulatory, and contractual requirements, ensuring its update based on the evolution of the regulatory and organizational context.

Disciplinary Actions

Violation of the provisions contained in this Policy or related documents may result in the adoption of disciplinary measures and/or legal actions, depending on the severity of the behavior and any impacts resulting from negligent or intentional conduct. Infractions committed by employees, collaborators, or third parties operating on behalf of the organization constitute a breach of contractual obligations and will be sanctioned in accordance with current legislation, applicable contracts, and internal procedures. Where applicable, Prima Electro reserves the right to report the facts to the competent authorities for civil or criminal evaluations.

Validity, Approval, and Revisions

This Information Security Policy is approved by Prima Electro S.p.A.

The policy is valid as of the date of approval by Prima Electro S.p.A.

6. TRADE COMPLIANCE

Prima Electro guarantees full compliance with EIFEC EC1001 International Standards and national, European, and international export control regulations. The Export Compliance Code (EIFEC EC1001.01:EU-CEC) serves as the reference for our corporate policy and is implemented through the Export Compliance Administration Program (ECAP), an integral part of the internal control system.

All export and re-export activities are carried out exclusively in compliance with authorizations issued by competent authorities; no transaction may be conducted in violation of applicable regulations or European Union security policies. Compliance with Trade Compliance rules is an essential condition for maintaining commercial relationships with Prima Electro. Any violations, in addition to exposing the company and responsible individuals to sanctions, constitute an infraction of the Code of Ethics and must be promptly reported in accordance with company procedures.

This Policy is an integral part of Prima Electro's Trade Compliance management system, with particular reference to the prevention of money laundering and transnational crimes. Any violation of Trade Compliance rules is considered a breach of the corporate Code of Ethics.

7. CONFLICT MINERALS AND CRITICAL RAW MATERIALS

In alignment with its ethical principles and value chain responsibility, Prima Electro recognizes the importance of responsible raw material sourcing. The company is committed to preventing the use of minerals that may directly or indirectly contribute to the financing of armed conflicts or severe human rights violations in high-risk areas.

To ensure transparency and reliability toward Customers and Stakeholders, Management is committed to:

Supply Chain Due Diligence

Prima Electro adopts a structured due diligence process consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This process makes it possible to monitor and verify the origin of Tin, Tantalum, Tungsten, and Gold (3TG), while also extending attention to other critical minerals such as Cobalt and Mica, to enhance transparency and mitigate risks along the supply chain.

Reporting Standards (CMRT and EMRT)

To ensure accurate, comparable data compliant with international industry standards, Prima Electro adopts the tools and protocols promoted by the Responsible Minerals Initiative (RMI) for data collection and evaluation along the supply chain.

In this context, we're committed to:

- **Supplier Surveys:** Annually administer the CMRT (Conflict Minerals Reporting Template) and EMRT (Extended Minerals Reporting Template) questionnaires in their most up-to-date versions to our component and raw material suppliers.
- **Data Analysis:** Verify the completeness and consistency of received responses, identifying the smelters and refiners within our supply chain.

Supplier Selection and Qualification

Adherence to responsible sourcing principles constitutes a qualifying criterion in the selection and evaluation of our commercial partners. We require suppliers to:

- Operate with transparency, providing complete and timely information on the origin of minerals and actively cooperating in due diligence activities;
- Source exclusively from smelters and refiners recognized as "Compliant" or "Active" by independent bodies, such as the Responsible Minerals Assurance Process (RMAP) or equivalent recognized audit programs.

Customer Responses and Transparency

Acting as a strategic partner, Prima Electro supports its Customers in meeting regulatory and compliance requirements regarding conflict minerals. We guarantee the timely transmission of reports (CMRT/EMRT) compiled based on information gathered from suppliers, ensuring prompt, documented responses consistent with industry standards.

Continuous Improvement

In line with our approach to continuous improvement and adopted sustainability criteria (including EcoVadis assessment requirements), we are committed to progressively strengthening supply chain traceability, collaborating with suppliers to mitigate any critical issues, and promoting—where technically applicable—the use of recycled materials or sources from responsible origins.