POLICY ON BUSINESS CONTINUITY

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Contents

1. INTRODUCTION

The METLAC Group, as established in its Business Model, in reference to its Strategy and Action Plan for Sustainable Development and its Business Continuity Plan, undertakes to follow a *Business Continuity* model in accordance with ISO 22301, to create a process that guarantees the continuation of its business activities, adopting prevention methodologies in the event that these activities are interrupted. It considers the Business Continuity process a fundamental element for protecting the Group's value and reputation, aware that it involves all company functions.

"Business Continuity" is a strategic, transversal process that guarantees the ability of an organisation to continue its activities even in situations in which critical processes or resources, whether human, material or infrastructural, are interrupted or unavailable. The main goal is to minimise the impact of incidents or accidents, regardless of their severity, with particular attention to economic, reputational and legal consequences or sanctions.

2. BACKGROUND

The METLAC Group undertakes to rigorously and effectively deal with any incidents, accidents and adverse impacts that might disrupt its business operations and consequently affect interested parties. The METLAC Group's primary objective is to ensure continuity in the supply of products and services through best practices, which are disseminated and applied by all functions and organisational structures.

For this reason, the company works constantly on the continuous improvement of its processes, with a dual focus: the prevention and the management of any incidents that might compromise or limit Business Continuity. Through constant monitoring of its performance, the company undertakes to ensure a safe, reliable, effective and professional service for customers and other Stakeholders.

2.1 REGULATORY REFERENCES

In structuring its Business Continuity plans, the METLAC Group looked to ISO 22301 of 2019, "*Social Security-Business Continuity Management System Requirement*", ISO 22301 (Business Continuity Management) and ISO 31000 (Risk Management guidelines) and to the guidelines established by the DRI (Disaster Recovery Institute) organisation.

The METLAC Group, being aware of the importance of ensuring business continuity and minimising the impact of any interruptions to its business operations, has adopted a rigorous, structured approach to its Business Continuity plans. To develop and maintain these plans, the Group relies on internationally recognised standards and guidelines, such as ISO 22301 of 2019, which defines the requirements for implementing an effective business continuity management system.

The Group also integrates the guidelines of ISO 31000, a global reference for Risk Management, which supports the identification, assessment and management of risks that could adversely affect operations.

2.2 SCOPE OF APPLICATION

This Policy is applied to the METLAC Group and its subsidiaries. It is specifically aimed at Stakeholders within the organisation, i.e. members of the Board of Directors, other Corporate Bodies and direct employees.

It is also addressed to the other Stakeholders, i.e. customers, suppliers, consultants, collaborators and business partners of the company and is considered fundamental in dealings with all corporate Stakeholders.

3. COMMITMENTS

This Policy establishes basic rules and guidelines to ensure Business Continuity, in accordance with current legislation and the company documents of reference.

Specifically, the METLAC Group undertakes to:

- **Comply** with all applicable domestic and international rules on Business Continuity, where relevant, thus ensuring that interested parties can demonstrate compliance with Business Continuity obligations.
- **Disseminate**, at all levels, precise responsibilities aimed at monitoring and applying the rules of Business Continuity, ensuring constant monitoring.
- **Promote** a proactive company culture that encourages safe behaviour and attitudes by parties with regard to Business Continuity, encouraging growth and awareness over time.
- **Define** objectives for continuous improvement, ensuring the availability of the necessary resources through the provision of adequate technical, economic and human resources.
- **Encourage** personnel to report critical events and share useful observations on how to improve processes, thereby creating an environment conducive to feedback and continuous optimisation.

4. STRATEGIES

Ensuring Business Continuity means adopting proactive measures to minimise negative impacts on the business in the event of an adverse event, thereby ensuring a rapid restoration of normal operations.

To achieve this, the METLAC Group has implemented a Business Continuity management system with the following main objectives:

- **To cultivate and maintain a commitment to continuous improvement**, spreading awareness of the importance of Business Continuity throughout the organisation. This commitment is communicated to every employee, supplier and customer, underlining the importance of a coordinated, responsible approach.
- **To promote a conscious and prepared environment**, in which each employee receives specific training on their responsibilities in terms of Business Continuity. The company provides the necessary resources for personnel to be able to operate safely and efficiently in the event of an accident or emergency, thus ensuring the resilience of the entire corporate system.

- **To establish and maintain a system of periodically revised policies** to ensure that every organisational structure is always ready to fulfil its responsibilities in terms of Business Continuity effectively. This approach ensures adaptation to regulatory evolutions and changes in the operational context.
- **To adopt preventive and reactive measures** to manage incidents, aligning with the requirements of Stakeholders. This includes identifying critical processes and services, protecting business assets, and safeguarding business value through proactive risk management.
- **To consolidate procurement and supply processes** to ensure continuity requirements are met throughout the value chain. This strengthens the company's ability to keep production and services operational even in crisis situations.
- **To increase the trust of customers and partners** by demonstrating a solid commitment to Business Continuity and the ability to maintain the quality and timeliness of services even in adverse conditions. This strengthens business relationships and consolidates the company's reputation on the market.

5. RISK MANAGEMENT

To develop an effective Business Continuity Plan, the METLAC Group identifies key assets, analyses potential issues, by conducting an in-depth analysis of specific risks, and identifies appropriate solutions.

The key steps in this strategic process are detailed below.

- **Definition of objectives**: the company clearly establishes the results it intends to achieve to ensure operational continuity. The objectives must be specific, measurable, achievable, relevant and time-bound (SMART). These objectives will guide all subsequent activities and will serve as a reference to assess the effectiveness of the Business Continuity Plan.
- **Information and training for contact persons**: this includes an understanding of the critical processes, the risk mitigation strategies and the operational procedures in the event of a disruption.
- **Identification of the company's key areas and critical processes**: the organisational structure is analysed to identify the areas and processes which are essential for continuous operation. This is done through a detailed mapping of business processes, identifying those that, in the event of an interruption, would have a significant impact on overall operations.
- **Analysis and assessment of the probability of occurrence and the impacts of risk elements**: the probability of an adverse event occurring and the impact that such an event would have on the critical processes are assessed. Existing controls, such as preventive measures, operating procedures, security technologies and risk management systems already in place, are also examined.
- **Creation of an operational plan**: this includes specific actions to mitigate the identified risks and resolution strategies to ensure operational activities are restored in the shortest possible time.
- **Annual review of the practices implemented**: the company assesses the effectiveness of the practices implemented, analysing any new threats or changes in the operating environment. This review ensures that the plan remains relevant and appropriate to the needs of the business and evolving situations by constantly improving continuity strategies.

The specific performance indicators used in the field of Business Continuity are:

- *Maximum Tolerable Period of Disruption* (*MTPD*), which is the maximum tolerable time that can be spent dealing with the negative impacts resulting from an accident or an incident as a result of the failure to supply a product, provide a service or carry out an operational activity.
- *Minimum Business Continuity Objective* (*MBCO*), which is the minimum level of service that is acceptable to the organisation to achieve its business objectives during the interruption of continuity due to an accident or an incident (crisis period).
- *Recovery Point Objective* (*RPO*), which is the maximum tolerable loss of data and information that minimises the impact of the accident or the incident (also called *Maximum Data Loss*).
- *Recovery Time Objective* (*RTO*), which is the period of time within which the services provided, production, support services and operational functions must be restored after the accident or the incident that generated the discontinuity.

The company keeps track of the activities carried out using a dedicated software package (*Q81* and its *MAMA* application) in which the risk analysis is entered, the activity is assigned, defining the responsibilities and an auditor is appointed who can verify the progress of the practices, providing evidence by compiling process-specific checklists .

6. ROLES AND RESPONSIBILITIES

The METLAC Group ensures that the roles and responsibilities related to the management of Business Continuity are clearly defined, assigned and communicated to all levels of the organisation. This approach actively involves all business functions, promoting a culture of shared responsibility and collaboration.

Every employee is required to comply with this Policy, in accordance with the specific tasks and responsibilities assigned. The implementation of this Policy is not only a formal obligation but represents a collective commitment for all members of the METLAC Group.

The METLAC Group's Business Continuity Policy is, therefore, an integral part of the corporate culture, which concerns the importance of preparation, prevention and readiness in maintaining the continuity of activities even in crisis situations.

7. APPROVAL AND REVIEW

This Policy document was prepared by the SQHSE Department in January 2025. The current version has been reviewed and approved by the METLAC Group's Board of Directors, which ensures its validity and compliance with the company's objectives.

The document may be revised or amended in the event of a change to the Strategic Plans, or as a result of mandatory regulatory updates or needs that emerge within the organisation, or following significant changes and/or relevant events. The main objective of these reviews is to ensure that the Policy remains suitable, adequate and effective, since Business Continuity is considered a dynamic process, which must be able to adapt to changes in the internal and external context of the company.

The METLAC Group undertakes to constantly monitor any developments that might affect the Policy, both locally and internationally, in all the countries in which it operates. This includes the analysis of external and internal factors that could impact Business Continuity, thus allowing performance to be assessed and corrective and improvement actions to be implemented with a view to continuous improvement.

In order be considered valid, new documents relating to Business Continuity shall be submitted to the **Board of Directors** for approval in order to guarantee consistency with strategic objectives and current legislation. This continuous review process ensures that the Policy remains a living, current entity, capable of responding to the ever-changing challenges of the operational and regulatory landscape.

8. DISSEMINATION

This Business Continuity Policy is disseminated and communicated to all employees and collaborators of the METLAC Group. To ensure the greatest transparency and accessibility, the Policy is also published in full on the corporate website (https://www.metlac.com), thus making it available to all Stakeholders. In this way, the METLAC Group undertakes to promote a culture of shared responsibility regarding Business Continuity, extending the awareness and importance of this issue to all those who come into contact with the organisation.

The METLAC Group also undertakes to ensure that every employee not only knows but understands the Business Continuity Policy in depth and applies it correctly when performing their daily activities. In addition, transparency in the communication of the Policy to external Stakeholders, including customers, suppliers and partners, allows a relationship of trust to be built and maintained, thereby demonstrating the company's commitment to the safety and stability of its operations. The adoption and constant monitoring of these practices are an integral part of the METLAC Group's strategic vision, aimed at ensuring the resilience and long-term sustainability of its activities.

CEO	*General Manager Italy*	*CRO*
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9. GLOSSARY

Auditor: the person in charge of verifying and certifying the conformity of a company's production processes (page 6).

Business Continuity: the ability of an organisation to continue to provide products or services at acceptable, predefined levels following a destabilising incident.

ISO 22301 (2019): *Business Continuity* refers to ISO 22301 of 2019, which specifies the requirements for planning, implementing, monitoring, reviewing and improving a company's business continuity management system, thus minimising the impact of any disruptions (page 3).

Disaster Recovery: the concept that includes the set of technological and logistical/organisational measures to restore systems, data and infrastructure in the face of any emergency that compromises their regular operation. It only concerns the IT systems and networks in a company and is designed to reduce the risk that the data in these systems might be lost; it has, therefore, as its main objective the restoration of information, leaving the possibility that such information is temporarily unavailable or inaccessible in the background (page 3).

ISO 31000: the international standard that allows the management and managerial efficiency in a company to be pro-actively improved (pages 3-4).

Best practices: the set of activities, procedures, behaviour, habits, which, when organised in a systematic way, can be taken as a reference to promote the achievement of the best corporate results in the company (page 3).

Business Continuity Plan: part of the primary processes contained in the METLAC Group's Management Manual and describes how the continuity of processes within a company can be managed (pages 3 and 5).

Q81 & MAMA: Q81 is the management software package used by METLAC in the field of Health, Safety, the Environment and Sustainability, while MAMA is the application adopted for mobile devices to manage checklists (page 6).

Risk Management: the practice of assessing, making decisions and planning all the activities necessary to minimise the negative impact of variability on business objectives (pages 3-4).

Stakeholder: any individual, group, or entity that has an interest in or an influence over an organisation's activities, decisions or results. Stakeholders are, for example, employees, customers and suppliers (pages 4 and 7).

Sustainable Development: by definition, this represents "development that meets the needs of current generations without compromising the ability of future generations to meet their needs". Within the industrial organisation of the METLAC Group, it is a distinctive element of the new corporate business model (page 3).