



## *POLICY ON BUSINESS CONTINUITY*

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## 1. INTRODUCTION

"Business Continuity" is a strategic and cross-functional process that ensures an organization's ability to continue its operations even in situations involving disruption or the unavailability of critical processes or resources, whether human, material, or infrastructural. Its primary objective is to minimize the impact of incidents, regardless of their severity, with particular attention to economic, reputational, legal and regulatory consequences.

METLAC Group, in line with its Corporate Policy and Business Model, and with reference to its Sustainable Development Strategies, is committed to integrating a Business Continuity framework into its processes in accordance with ISO 22301, in order to ensure the resilience of its business operations and the continued delivery of products and services in the event of scenarios that could otherwise cause disruption.

METLAC Group regards Business Continuity as a fundamental element for safeguarding the Group's value and reputation, as well as for meeting the requirements of its stakeholders, recognizing that it involves all organizational functions.

## 2. BACKGROUND

METLAC Group is committed to addressing any incidents and adverse impacts that may disrupt its business operations in a rigorous and effective manner and consequently affect its stakeholders. The primary objective of METLAC Group is to ensure continuity in the delivery of products and services through the adoption of best practices, which are disseminated and applied across all functions and organizational units.

To this end, the Company is continuously committed to improving its processes through the following steps: the definition of clear objectives, the assessment of impacts and risks, the identification of business continuity strategies and solutions, and the implementation of plans and procedures, including regular testing and exercises to measure their effectiveness. Through ongoing performance monitoring, the Company strives to ensure a safe, reliable, efficient, and professional service for customers and other stakeholders.

### 2.1 REGULATORY REFERENCES

METLAC Group is committed to meeting the requirements of internal and external stakeholders, as well as legal, contractual, and regulatory requirements. To ensure this, Business Continuity Plans are structured in accordance with ISO 22301:2019 "Security and Resilience – Business Continuity Management Systems – Requirements", the ISO 31000 guidelines (Risk Management guidelines), and those established by the Disaster Recovery Institute (DRI).

### 2.2 SCOPE OF APPLICATION

The scope of application of this Policy applies to METLAC Group and its subsidiaries incorporated under national law and located within the Italian territory, with reference to the following processes:

- Procurement Management (procurement of raw materials and services)
- Customer Management (sales and marketing of products)
- Information Services (Information and Communication Technology – ICT, Operational Technology – OT, and internal information systems – ERP)

### 3. COMMITMENTS

This Policy aims to establish fundamental rules and guidelines to ensure Business Continuity, in compliance with applicable laws and regulations, as well as other relevant requirements, including corporate reference documents and internal regulations.

METLAC Group is committed to:

- Complying with all applicable national and international regulations in the field of Business Continuity, where relevant, thus ensuring that stakeholders can demonstrate compliance with Business Continuity obligations.
- Defining and disseminating roles, responsibilities, and authorities at all levels for the implementation of the Business Continuity framework, ensuring continuous monitoring.
- Establishing specific (SMART) objectives for continuous improvement, ensuring the availability of human, technical, organizational, and financial resources.
- Fostering and maintaining a commitment to continuous improvement, promoting awareness across the entire organization of the importance of Business Continuity. This commitment is communicated to all employees, suppliers, and customers, highlighting the importance of a coordinated and responsible approach.
- Promoting a prepared and aware working environment, where each employee receives specific training on their responsibilities regarding Business Continuity. The Company provides the necessary resources to enable personnel to operate safely and effectively during incidents or emergencies, thereby ensuring the resilience of the entire organization.
- Establishing and maintaining a system of policies, plans, and procedures, subject to periodic review, to ensure that all organizational units are continuously prepared to effectively fulfill their Business Continuity responsibilities. This approach ensures alignment with regulatory developments and changes in the operating environment.
- Adopting preventive and reactive measures for incident management, in alignment with stakeholder requirements. This includes the identification of critical processes and services, the protection of corporate assets, and the safeguarding of company value through proactive risk management.
- Strengthening procurement and supply processes to ensure that continuity requirements are met throughout the value chain, thereby reinforcing the Company's ability to maintain operations and service delivery even in crisis situations.
- Enhancing the trust of customers and partners by demonstrating a concrete commitment to Business Continuity and the ability to maintain the quality and timeliness of services even under adverse conditions. This contributes to strengthening business relationships and consolidating the Company's market reputation.

## 4. STRATEGIES

Ensuring Business Continuity means adopting proactive measures to minimize negative impacts on the business in the event of adverse situations, while ensuring the rapid recovery of normal operations. In defining its objectives, METLAC Group considers external and internal context factors, stakeholder requirements, and the strategic objectives defined at Group level, which are:

- Business Value
- People & Governance
- Global Market
- Digital Transformation

Based on these strategic objectives, METLAC Group has identified the following specific Business Continuity objectives:

### Business Value

- Ensure long-term visibility on critical raw materials, safeguarding continuity and security of supply.
- Implement a differentiated supplier qualification approach, focusing on reliability, performance, and compliance with corporate standards.
- Promote the evolution of the supply chain, making it more flexible, resilient, and innovation-oriented.
- Assess and monitor risks across the entire supply chain, to prevent disruptions and ensure process quality.
- Strengthen Business Continuity strategies and procedures, ensuring response capability and recovery from critical events.

### People & Governance

- Review and update the corporate welfare model to enhance employee well-being, motivation, and retention.
- Expand warehouse operations and logistics processes.
- Optimize inventory management.
- Implement digital reskilling and upskilling programs to enhance competencies and awareness in digital and IT areas.
- Promote structured sharing of corporate know-how, to enhance internal expertise and facilitate knowledge transfer.

### Global Market

- Develop local representatives for the France and Spain regions to strengthen market presence and improve customer relationships.
- Establish and consolidate strategic partnerships in the Far East to expand business opportunities and enter new markets.
- Conduct in-depth market analysis in the Middle and Far East regions to identify trends, customer needs, and growth potential, supporting strategic decisions and market entry.

## Digital Transformation

- Apply artificial intelligence solutions to support production models (formulations/recipes), optimizing processes and improving quality.
- Acquire rights to software customizations, ensuring flexibility and adaptability of digital tools to business needs.
- Promote a digital culture, fostering skills and a mindset oriented towards innovation and digital transformation.
- Support process dematerialization by reducing paper usage and digitalizing document management.
- Manage IT change (IT change management), ensuring continuity and security during technological transitions.
- Strengthen corporate cyber resilience by enhancing the ability to prevent, detect, and respond to cyber threats.

The Company clearly defines the results it intends to achieve to ensure Business Continuity. The above objectives have been identified as specific, measurable, achievable, relevant, and time-bound (SMART). These objectives guide all subsequent activities and serve as a reference for assessing the effectiveness of the Business Continuity Plan.

## 5. RISK MANAGEMENT

To develop an effective Business Continuity Plan, METLAC Group identifies its critical assets, analyses potential issues by conducting a thorough assessment of specific risks and defines appropriate mitigation and recovery solutions.

The key phases of this strategic process are aligned with ISO 31000 guidelines. METLAC Group ensures:

- Information and training for key personnel, including understanding of critical processes, risk-based thinking, identification of risk mitigation strategies, and operational procedures to be followed in the event of disruption.
- Identification of key areas and critical business processes: the organizational structure is analysed to identify essential areas and processes required for continuous operations. This is achieved through detailed process mapping, highlighting those activities whose disruption would significantly impact overall operations.
- Analysis and evaluation of the likelihood and impact of risks: the probability of adverse events and their potential impact on critical processes are assessed. Existing controls are also reviewed, including preventive measures, operating procedures, security technologies, and risk management systems already in place.
- Development of a risk treatment plan, including specific actions to mitigate identified risks and response strategies to ensure the restoration of operations in the shortest possible time.
- Review of implemented practices: the Company evaluates the effectiveness of the measures adopted by analysing new threats, changes in the operating environment, and variations in both external and internal context. This review is carried out annually, or whenever necessary due to such changes, ensuring that the plan remains relevant and adequate, while continuously improving Business Continuity strategies.

Within the scope of assessing the impact of disruptions on business processes, the following indicators are considered:

- Maximum Tolerable Period of Disruption (MTPD): the maximum period during which the organization can tolerate the negative impacts resulting from the inability to deliver a product, provide a service, or perform an operational activity.
- Minimum Business Continuity Objective (MBCO): the minimum level of services or products that is acceptable to the organization to achieve its business objectives during a disruption (crisis period).
- Recovery Point Objective (RPO): the maximum acceptable data loss (also referred to as Maximum Data Loss) that minimizes the impact of an incident.
- Recovery Time Objective (RTO): the timeframe within which products, services, production, support services, and operational functionalities must be restored following an incident that has caused disruption.

The Company tracks its activities in accordance with the Enterprise Risk Management (ERM) process, using the dedicated tools it has implemented.

## 6. ROLES AND RESPONSIBILITIES

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

These roles are clearly identified within the Business Continuity Plan and include roles, responsibilities, and authorities during crisis management (incident response structure), ensuring appropriate redundancy for each of them.

All employees are required to comply with this Policy, in accordance with their specific duties and assigned responsibilities. The implementation of this Policy is not merely a formal obligation, but represents a collective commitment shared by all members of METLAC Group.

The METLAC Group Business Continuity Policy is therefore an integral part of the corporate culture, emphasizing the importance of preparedness, prevention, and readiness to maintain operational continuity even in crisis situations.

## 7. APPROVAL AND REVIEW

This Policy document was prepared by the SQHSE Department in March 2026. The current version has been reviewed and approved by the Board of Directors (BoD) of METLAC Group, which ensures its validity and alignment with the Company's objectives.

Any amendments or revisions to this document shall be made in the event of changes to strategic plans, mandatory regulatory updates, internal needs identified within the organization, or following significant changes and/or relevant events. The primary objective of such revisions is to ensure that the

Policy remains suitable, adequate, and effective, recognizing that Business Continuity is a dynamic process that must be capable of adapting to changes in the Company's internal and external context.

METLAC Group is committed to continuously monitoring any developments that may affect this Policy, both at local and international levels, across all countries in which it operates. This includes the analysis of external and internal factors that may impact Business Continuity, enabling the evaluation of performance and the implementation of corrective and improvement actions in a continuous improvement perspective.

To be considered valid, all new Business Continuity-related documents must be submitted for approval to the Board of Directors, which ensures their consistency with strategic objectives and applicable regulations. This continuous review process ensures that the Policy remains a living and up-to-date document, capable of responding to the evolving challenges of the operational and regulatory environment.

## 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  
Pier Ugo Bocchio



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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).

**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).