



**Integrated Policy
Quality, Environment, Safety,
Ethics and Sustainability**

Comet Management adopts and maintains an Integrated System that covers various aspects, all of which are equally important for the Organization: Quality, Environment, Safety, Ethics, and Sustainability.

The entire business process needs to be adequately and continuously controlled, to ensure higher performances than market average in terms of quality and efficiency in line with the annual objectives, while respecting health, safety and environmental standards.

The Company aims to develop an ethical awareness throughout the entire supply chain. For this reason, a Code of Ethics has been established along with the Organizational Model 231 (subject to regular audits by the Supervisory Body). Furthermore, a Sustainability Report has been prepared starting from the data concerning the 2021 and moving forward, the Company intends to publish on a regular basis data regarding environmental, social and governance (ESG) issues.

For many years, Comet has been certified according to the Quality Standard ISO 9001 and, in 2018 Comet also obtained a new certification according to the Environmental Standard ISO 14001.

Regard to Safety, several years ago, the Company formalized a management system according to UNI-INAIL Guidelines (SGSL), with the future aim of ISO 45001 certification.

In 2021, Comet implemented the Organizational Model 231, which is actively pursued with conviction and commitment. In 2022, the first Sustainability Report for 2021 was published, and each year it is updated to ensure transparency regarding decisions, integrity policies, and the desire to share information with all Stakeholders, not only in rubber industry but also within the broader Community.

The growing demands of the market and the desire to meet specific customer requirements led to the extension of the Quality Management System with IATF 16949 principles, in order to strengthen the Company position in the automotive industry and to promote the acquisition of new opportunities.

The maintenance of the Integrated System requires the collaboration of the entire Company structure, starting from the General Management, through Managers, up to each worker: involvement and consultation is fundamental for an effective and well-functioning system.

For years, Comet has set out objectives aimed at improving the satisfaction of customers, employees, suppliers, more specifically:

- consistently high-quality compounds,
- prompt and competent technical service,
- timely, precise, and customer-satisfactory commercial service,
- accurate and timely administrative service towards suppliers and customers,
- satisfactory purchasing service for suppliers,
- peaceful, comfortable, and motivating work environment for all employees
- a system focused on the culture of risk prevention in the workplace and on the necessary conditions for sustainable development,
- a system focused on environmental protection and reducing industrial impacts.



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Additionally, Comet Management is committed to assess the internal and external context in order to identify risks and opportunities that arise from meeting stakeholder expectations.

In particular, the following stakeholders and their expectations are considered:

Stakeholders	Needs and expectations
People within the Organization	Stability of employment – Working in a peaceful and non-polluted environment
Suppliers and Partners	Mutual benefit and continuity of the relationship
Customers and End consumers	Low environmental impact products
Institutions and Regulatory Bodies	Operating in compliance with environmental regulations and standards
Local Community	Operating in compliance with environmental regulations and standards Avoiding environmental pollution incidents

It is also essential to conduct a risk analysis and implement actions that protect the Company from events that may undermine its stability.

The Management is therefore committed to:

- with the support of Managers define annually the targets for continuous improvement in all areas, including those related to health and safety; share these targets with all employees and provide the necessary human resources and equipment to achieve them;
- ensure compliance with applicable laws and all other requirements to which the Organization subscribes, related to environmental, health and safety issues;
- maintain and monitor the Organizational Model 231, so that it becomes an integral part of the Company;
- promote spreading, understanding and the implementation of the Ethical Code principles in daily practices;
- establish regular Sustainability Reports, in pursuit challenging improvement goals;
- analyse risks related to business continuity, asset integrity, reputation and sanctions;
- monitor energy and water consumption, waste production to identify potential issues and define necessary actions to reduce them, where possible;
- monitor safety indicators;
- prevent air, water and soil pollution and the occurrence of work-related injuries and diseases through periodic analyses of emissions, water quality, workplace conditions, careful preventive maintenance program, continuous monitoring of plant and machinery efficiency, implementation of an annual audit program involving all processes;
- analyse and monitor external environmental impacts to minimize them as much as possible in respect of surrounding areas;
- inform, train and raise awareness among employees about the importance of working safely, the environmental protection measures implemented, and improve efficiency and quality when responding to emergency situations;



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- collaborate with suppliers of raw materials to research products with low environmental impact and that can be safely handled;
- select service providers considering their commitment to environmental protection and requiring them to adhere to internal rules of conduct;
- work in partnership with customers and analyze their needs in order to develop increasingly innovative products with a low environmental impact;
- participate actively in meetings with industry associations to develop common guidelines, address critical issues and promote projects;
- participate actively in supporting professional schools to develop the culture in rubber industry and professional figures;
- pay attention to the emergence of new social values and needs to which align with;
- periodically review this Policy and the whole Integrated Management System;
- communicate to the Organization the objectives set out to increase participation and involvement of all employees.

Matteo Bernini

Chief Executive Officer