

		
	Politica integrata del sistema di gestione qualità	Rev.00 del 29/06/2026

INTEGRATED POLICY OF THE QUALITY MANAGEMENT SYSTEM

1. Introductory Section

1.1. Purpose of the Integrated Policy

This Integrated Policy aims to consolidate within a unified, consistent, and harmonious framework the principles, guidelines, and commitments that steer company actions across key areas of ethical, organisational, social, and environmental significance.

Through this document, Necto Group intends to express in a coordinated form the values inspiring its business activities and the general rules of conduct that must guide internal and external relations, the management of organisational and commercial processes, and the development of the organisation over time.

The Integrated Policy therefore serves as a benchmark for the responsible conduct of corporate activities, in line with the Group's identity, its development model, and the ethical and professional standards adopted.

1.2. Scope of Application

This Integrated Policy applies to all activities of Necto Group and serves as a general reference for behaviours and decisions made within the organisation.

The principles outlined herein apply, within their respective remits, to internal relations and to interactions with clients, collaborators, suppliers, commercial partners, and all other stakeholders, promoting an operating model based on fairness, responsibility, transparency, quality, and sustainability.

1.3. Addressees

The Integrated Policy is addressed to all individuals working with Necto Group or acting on behalf of the organisation, including directors, employees, collaborators, consultants, suppliers, commercial partners, and anyone maintaining professional relations with the company.

Compliance with the principles contained in this document forms an integral part of the professional responsibilities of the addressees and constitutes an essential element in internal and external relations.

1.4. Corporate Values

Necto Group operates in the marketing of electrical materials, adopting an approach focused on quality, reliability, responsibility, and continuous improvement.

From the available documentation, the core corporate values emerge as:

- the quality and reliability of products, processes, and services;
- technological innovation and the continuous development of skills;
- the central role of people and the enhancement of human capital;
- social responsibility and environmental sustainability;
- integrity, transparency, and professional fairness;
- compliance with current regulations and market rules;
- customer focus and attention to the supply chain.

These values form the foundation of the corporate identity and guide the development of activities, supply chain management, and relations with the domestic and international market.

1.5. General Principles of Action

Necto Group recognises legality, integrity, transparency, and professional fairness as essential principles for carrying out its activities and for safeguarding corporate reputation, credibility, and reliability.

The organisation demands that every professional relationship be managed in accordance with principles of fairness, impartiality, responsibility, and good faith, promoting conduct consistent with corporate values and adopted ethical standards. Conduct contrary to the principles of integrity and transparency—including instances of corruption, fraud, abuse of power, improper favouritism, unfair competition, or improper and non-transparent commercial practices—is strictly prohibited.

This section must be read in conjunction with Necto Group's Code of Ethics, which serves as an explicit reference for the principles and rules of conduct adopted by the organisation.

2.1. Relations with Clients and the Market

Necto Group builds relationships with clients and stakeholders based on fairness, reliability, transparency, and professionalism, recognising the value of trust as an essential element for building solid and lasting relationships.

Commercial activities are conducted in compliance with the principles of free competition, fair negotiation, and professional responsibility, promoting ethical behaviour consistent with corporate values. Particular attention is devoted to clear communication and honouring commitments through the dissemination of accurate, truthful, and understandable information.

Any behaviour or practice that could prove misleading, unfair, or capable of undermining the trust of clients or the market is not permitted.

2.2. Relations with Suppliers and Partners

Necto Group recognises the strategic value of collaboration with suppliers and commercial partners, fostering relationships founded on reliability, fairness, and transparency.

Partner selection is based on objective criteria related to quality, professional competence, operational reliability, and compliance with applicable regulations, with increasing focus on environmental and social aspects. The organisation encourages relationships based on mutual trust, continuity, and the sharing of standards consistent with the Code of Ethics, promoting responsible conduct across the entire supply chain.

Any behaviour or practice that could prove misleading, unfair, or capable of undermining supplier and partner trust is strictly prohibited.

2.3. Confidentiality and Data Protection

Corporate, technical, commercial, and strategic information represents a valuable asset for Necto Group and must be handled with the utmost confidentiality and responsibility.

All addressees are required to protect confidential information and company know-how, use corporate tools and systems correctly, avoid unauthorized disclosures, and comply with current privacy and personal data protection regulations.

Information acquired during the performance of work duties may be used exclusively for professional purposes and in compliance with company authorisations. Particular attention is dedicated to the proper and secure management of data through the adoption of organisational and technical measures aimed at protecting information and maintaining confidentiality.

2.5. Communication and Protection of Corporate Reputation

Necto Group protects its reputation through conduct aligned with company values and promotes accurate, transparent, and responsible communication.

External communications must be truthful, accurate, clear, and understandable, consistent with corporate principles, and managed exclusively by authorized departments.

Disseminating false, misleading, or potentially damaging information regarding company image, reputation, or reliability is strictly forbidden. The Group's reputation represents a strategic asset built over time through ethical conduct, professionalism, and trust-based relationships.

2.6. Bribery and Corruption

Necto Group adopts an approach marked by integrity and transparency in operational and commercial activities and tolerates no improper conduct linked to bribery, corruption, or abuse.

In all professional relationships, both internal and external, addressees of this Integrated Policy must act with fairness, responsibility, impartiality, and good faith, avoiding any conduct that could compromise decision-making transparency or distort relationships with clients, suppliers, partners, or other stakeholders.

The organisation promotes an ethical culture focused on preventing conduct non-compliant with the Code of Ethics.

Within this framework, improper favours, abuses of power, or conduct incompatible with legality and professional integrity are strictly prohibited.

2.7. Conflict of Interest

All addressees must act in the organization's best interest, avoiding situations, behaviours, or activities that could compromise impartiality, fairness, and transparency in professional decisions.

Operational and commercial choices must be made responsibly and independently, avoiding conditions where personal or external interests might influence company activities or interfere with organizational goals.

Any situation potentially leading to a conflict of interest must be promptly reported to competent company managers to ensure proper and transparent handling.

2.8. Fraud

Necto Group does not tolerate fraudulent acts or misleading and unfair practices that could damage the trust of clients, the market, suppliers, partners, or other stakeholders.

Commercial and professional activities must be conducted in compliance with principles of fair negotiation, professional responsibility, and transparency, including through accurate, truthful, and clear communication.

The organisation promotes ethical behaviour consistent with its values, opposing any conduct that could harm company reputation or distort internal and external relationships.

3. Social Policy

Necto Group recognises the importance of organizational well-being and quality professional relationships as vital elements for organizational growth and human capital development.

From this perspective, the company fosters a work environment grounded in mutual respect, inclusion, collaboration responsibility and care for individuals understanding that workplace well-being enhances work

The Social Policy integrates with principles detailed in sections dedicated to human rights, equal opportunities, health and safety, and human resource management, which form its primary scope of application.

3.1. Human Rights

Necto Group acknowledges respect for human rights as a core principle of its operations and promotes an organizational and relational model based on human dignity, mutual respect, protection of physical and moral integrity, and the valuing of every individual.

In line with corporate values expressed in reference documentation and ethical principles guiding the Group, Necto Group aligns its activities with fundamental human rights and core labour principles recognized internationally, specifically referring to:

- The Universal Declaration of Human Rights, adopted and proclaimed on 10 December 1948 by the United Nations General Assembly.
- The International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights, adopted by the UN General Assembly in 1966 and entered into force in 1976 (in Italy in 1978).
- The Declaration on Fundamental Principles and Rights at Work adopted by the International Labour Organization (ILO) in 1998 and its core Conventions.
- UN Conventions on women's rights, the elimination of all forms of racial discrimination, children's rights, and rights of persons with disabilities.
- The Standards of Conduct developed in 2017 by the UN High Commissioner for Human Rights to support businesses in tackling discrimination against lesbian, gay, bi, trans, and intersex (LGBTI) people.

In this regard, the Group promotes respect for personal freedom and dignity, rejects all forms of discrimination, coercion, intimidation, abuse, or exploitation, and supports workplace health, safety, and fair working conditions.

Necto Group does not tolerate conduct violating human rights, freedom, safety, or personal dignity, fostering professional relations based on fairness, inclusion, and responsibility internally and externally.

Respect for human rights manifests through care for individual protection, prevention of discrimination and harassment, health and safety promotion, skill development, and creating an inclusive workplace environment.

Necto Group encourages the spread of these principles across its supply chain and partner interactions, reinforcing its commitment to fairness, social responsibility, and sustainability.

3.2. Equal Opportunities, Personal Dignity and Inclusion

Necto Group promotes equal opportunities and a working environment marked by inclusion, respect for the individual, and safeguard of personal dignity.

Discrimination based on gender, age, nationality, religion, personal orientation, physical or social condition, or political opinion is strictly prohibited, as is any form of harassment or offensive behaviour.

In defining diversity and inclusion guidelines, Necto Group draws inspiration from key tenets of the Italian Constitution, notably:

Article 3 of the Constitution of the Italian Republic: «All citizens have equal social dignity and are equal before the law, without distinction of sex, race, language, religion, political opinions, personal and social conditions. It is the duty of the Republic to remove those obstacles of an economic and social nature which

- Article 37 of the Constitution of the Italian Republic: «Working women have the same rights and, for equal work, the same wages as working men. Working conditions must allow the fulfilment of her essential family function and ensure special adequate protection for mother and child».

The applicable National Collective Bargaining Agreement (NCBA) reinforces this approach by emphasizing fair, inclusive work culture and affirming the right of all workers to be free from discrimination. Documentation highlights prohibitions against gender pay gaps, gender-based violence, and endorses respect for ethical-religious beliefs (where compatible with organizational needs) alongside supporting workers with disabilities. Aligned with these principles, Necto Group considers preventing discrimination, harassment, and offensive behaviour an essential part of its corporate culture and internal relationships.

4. Human Resources Policy

People represent an essential element for Necto Group's growth, stability, and development. The organisation dedicates targeted effort toward maintaining an inclusive, safe, and respectful environment that values skills, professionalism, and individual contribution.

Human resources management is based on mutual respect, responsibility, collaboration, and shared goals, viewing human capital development as a strategic factor for continuous improvement and long-term competitiveness.

For all aspects concerning employment contract initiation, management, execution, and termination, as well as economic and regulatory terms, Necto Group refers to the National Collective Bargaining Agreement for Commerce, Tertiary, Distribution and Services – Conflavoro PMI attached to official documentation.

This includes provisions on hiring, probationary periods, duties, job grading, working hours, annual leave, permits, leave of absence, remuneration, parental protection, part-time work, agile working (smart working), sick leave, injury, notice periods, union relations, and statutory safeguards. These aspects are regulated directly by the referenced NCBA.

4.1. Training, Professional Growth and Skills Development

Necto Group promotes continuous training, professional growth, and technical skills development, viewing them as strategic drivers for operational refinement and competitive strength.

Ongoing development of technical, commercial, and organizational know-how—combined with professional refresher training—enhances process quality and the company's capability to adapt to market and supply chain developments.

The governing NCBA references tools related to training, professional growth, educational rights, and qualification pathways that complete the human resource framework.

Operationally, Necto Group utilizes a training plan (Sec. 6 Mod. 05) to track and monitor completed courses, ensuring organized training management and record-keeping.

4.2. Worker Health, Safety and Well-being

Safeguarding health, safety, and individual well-being is a top priority for Necto Group and an integral component of company culture and operational design.

Focus on risk prevention and personal protection guides daily operations to ensure safe, healthy work environments compliant with governing laws. Corporate commitment manifests through:

- fostering a culture of occupational safety;
- continuous training and professional updates;
- adopting preventive procedures and effective control measures;
- continuous improvement of business processes regarding health and safety.

To support health and safety management, Necto Group maintains a Risk Assessment Document (DVR) as the core tool for identifying, evaluating, and managing operational risks.

The adopted NCBA reasserts the central role of workplace safety, health protection, training, environmental care, worker safety representatives, preventive measures, and organizational management models.

All staff are required to adhere to company procedures, use protective equipment properly, and actively contribute to risk prevention and workplace safety.

5. Environmental Policy

Necto Group operates with careful consideration of the environmental impact of its activities, encouraging responsible and efficient resource management in recognition that environmental sustainability and economic growth are inextricably linked.

Necto Group directs its efforts toward preventing and reducing environmental impact, continuously improving environmental performance, and fostering responsible behaviour across its operations and supply chain.

5.1. Energy Consumption

Among its environmental commitments, Necto Group promotes energy efficiency as a key lever for responsible resource management and performance improvement.

The organisation aims to eliminate waste, optimize resource utilization, and monitor and reduce environmental footprints. Continuous improvement serves as a benchmark for advancing environmental performance and process efficiency.

Supporting these goals, specific operational instructions are implemented to reduce energy consumption, guiding personnel toward responsible resource use.

5.2. Waste Management

Necto Group encourages responsible resource handling and structures its operations to minimize waste and environmental impact.

In this regard, operational instructions target waste reduction, packaging reuse, and proper waste sorting, reinforcing environmental responsibility and continuous improvement.

These practices strengthen organisational focus on impact prevention, material efficiency, and responsible workplace habits.

5.3. Continuous Improvement and Awareness

Necto Group supports continuous environmental performance improvement and promotes ESG awareness among staff, suppliers, and partners, encouraging responsible conduct throughout the supply chain.

The Group's environmental strategy forms part of a broader vision for responsible development where sustainability is embedded into decision-making, organizational structure, and stakeholder relations.

6. Quality and Innovation

Creativity, innovation, and dynamism are foundational to Necto Group's business sector, enabling rapid adaptation to market shifts and effective responses to client needs.

Quality represents a strategic priority for Necto Group and lies at the core of business operations and partner relationships.

The organisation nurtures a culture focused on continuous improvement, technological advancement, and process reliability to deliver high quality standards, operational efficiency, and market-aligned solutions.

In line with its Quality Policy, special attention is devoted to customer satisfaction, product and service safety, technical know-how enhancement, and ongoing skill and process development. Innovation stands as a defining trait of corporate identity, fostering efficient, sustainable solutions suited to evolving supply chain demands.

This policy is reviewed periodically during Management System Reviews alongside corporate objectives, and is updated or revised as necessary.

7. Sustainable Procurement Policy

Necto Group recognizes procurement as a strategic domain vital to product quality, business continuity, and social/environmental responsibility. Given the nature of the business—marketing electrical supplies sourced globally—a properly functioning supply chain is of paramount importance.

Disruptions in the supply chain can significantly impact product availability, quality, process reliability, and the company's ability to meet market demands reliably. Therefore, Necto Group promotes a procurement policy focused not only on sustainability, but also on building robust, transparent, and reliable supplier relationships.

The organisation views sustainable procurement as ethically necessary and essential for driving responsible behaviour across the supply chain, acknowledging that sustainability requires addressing environmental and social factors throughout procurement.

Necto Group's philosophy relies on supplier relationships built on mutual trust and collaboration, supported by a growing focus on factors affecting sustainability, supply integrity, and product quality.

7.1. General Principles

Necto Group's procurement approach is based on:

- supplier relationships grounded in mutual trust and collaboration;
- incorporating sustainability criteria into supplier selection and evaluation;
- attention to environmental and social impacts across the supply chain;
- promoting ethical, transparent, and responsible conduct among suppliers;
- collaborating with suppliers to identify sustainable solutions and achieve ongoing improvement;
- focusing on supply chain resilience and reliability, given procurement's strategic role in business continuity.

7.2. Supplier Selection and Evaluation Criteria

Necto Group directs its procurement strategy toward selecting suppliers that contribute to product quality, high efficiency, and long-term relationships.

The organisation aims to:

- include sustainability criteria in supplier selection;

- give preference to suppliers adopting sustainability and worker protection policies;
- prioritise vendors implementing tools to prevent and reduce discrimination, corruption, and abuse;
- verify supplier sustainability commitments through review of documentation, sustainability reports, and Codes of Ethics;
- favour local or regionally linked suppliers where possible to optimize transport and lower logistics emissions;
- request data on recycled content percentages in manufacturing processes to support collaborative sustainability goals.

Given the international structure of the supply chain, these criteria strengthen organizational awareness regarding supplier commitments, practices, and reliability.

To achieve these objectives, Necto Group established a Supplier Code of Conduct—signed by all suppliers—setting out mandatory social, environmental, and ethical requirements.

7.2.1. Supply Chain Ethical, Social and Environmental Requirements

Within the Code of Conduct, Necto Group emphasizes respect for human rights, diversity, decent working conditions, occupational health and safety, prohibition of child/forced labour, proper working hours, and fair compensation. Simultaneously, emphasis is placed on reducing manufacturing and material environmental impacts, optimizing energy use, minimizing waste, using raw materials responsibly, advancing product circularity, and managing waste and pollution risk properly.

Suppliers must operate ethically and transparently, avoiding bribery, conflicts of interest, or improper conduct. For Necto Group, these elements are essential to building dependable supply relationships aligned with company values, particularly across global supply channels.

Necto Group monitors compliance via document audits, supplier dialogues, and periodic evaluations in line with reference procedures.

8. Implementation of the Integrated Policy

Necto Group promotes the communication of this Integrated Policy to employees, collaborators, suppliers, partners, and stakeholders, encouraging active adherence in daily activities.

The organisation provides dedicated reporting channels to raise concerns regarding non-compliant behaviour, guaranteeing confidentiality, fairness, and protection for whistleblowers.

Failure to comply with the principles outlined in this Integrated Policy may result in corrective actions consistent with applicable regulations, company rules, and contractual terms.

This Integrated Policy serves as a framework for Necto Group's responsible, sustainable, and transparent development, operating in synergy with the Code of Ethics and related organizational procedures.

9. Final Provisions

Through this Integrated Policy, Necto Group reaffirms its dedication to quality, innovation, sustainability, integrity, and human capital development, fostering a business model focused on growth, responsibility, and continuous improvement.

Adherence to these principles is essential for maintaining stakeholder trust, building corporate reputation, and sustaining Necto Group's long-term growth and reliability across domestic and international markets.

This Integrated Policy is subject to periodic review by Management and may be updated or revised to reflect organizational changes, operational contexts, internal reference documents, or corporate goals.