



Backbone Infrastructure Foundation (BIF)

Integrated Company Policy

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1 Company Policy

The Backbone Infrastructure Foundation (hereinafter “the Company” or “BIF”) is committed to operate according to the principles of sustainable development in order to offer its Clients services and products with high added value that contribute, in compliance with applicable laws, to economic progress, to the improvement of social well-being and to the protection of the environment of the Countries in which it operates.

The Owners and Top Management of BIF are aware that only thanks to the commitment of all those who work in the Company and for the Company is possible to:

- execute complex works supporting, sharing and applying in their sphere of influence the fundamental principles of the United Nations Global Compact regarding human rights, labour standards, environmental protection and the fight against corruption;
- create products and works, using the best construction methods and technologies that guarantee, within the time limits established by the contracts, a high-quality result that also entails a consequent limitation of operating costs;
- protect the Workers’ Health and Safety, ensuring health surveillance in agreement with the competent physician and analysing in detail the production activities to identify risks and prevent events;
- to encourage the consultation and participation of the workers and, where established, of workers' representatives, on matters related to Health and Safety;
- safeguard the environment, analysing the significant aspects to prevent possible impacts and using raw materials in a rational and sustainable way, favouring, where possible, recovery and/or recycling, encouraging the development and use of innovative technologies both in the design phases and in the construction phases of the works;
- guarantee the dignity of every worker and offer equal opportunities without any gender distinction respecting diversities of any kind.

This document constitutes a formal declaration with which the Owners and the Top Management intend to set out the corporate strategic guidelines and the principles on the basis of which the Organization must develop the Company Management System, in order to pursue an ethical, sustainable and respecting the interested parties involved in the production processes.

This Integrated Policy (hereinafter the “Policy”) is structured according to the following main themes:

- Quality Policy;
- Environmental Policy;
- Occupational Health and Safety Policy;
- Sustainability Policy;
- Sustainable Procurement Policy;
- Human Resources Management Policy;
- Anti-Corruption Policy and Anti-competitive Practices.

The contents of this Policy:

- Apply to all operations carried out by the Company both in Switzerland, Nigeria and abroad;
- Are approved by the Presidency of the Board of Directors;
- Are disclosed to the entire Company organization, to all collaborators and other interested parties through information system distribution and publication on the Company website.

The Owners and the Top Management:

- Are committed to periodically review, on a minimum annual basis, the Policy to ensure its adequacy with the strategic and behavioural guidelines set, giving it adequate visibility to the entire Organization and to the interested parties;
- Consider as their responsibility to call all personnel of all levels and degrees, within the scope of their respective competences and responsibilities, operating in Switzerland, Nigeria and anywhere in the world, to full compliance with this Policy, with the Code of Ethics and what is defined in the Company's Management System.

BIF formally requests its business partners and suppliers to align themselves with the principles expressed in this Policy.

1.1 Quality Policy

the BIF mission is to provide complex works, excellent services and products through sustainable and innovative processes, using the best construction methods and technologies that guarantee, within the time limits set by the contracts, a high-quality result.

BIF has adopted an adequate and effective Quality Management System, aimed at the continuous improvement of performance and sustainability through careful risk management in the construction processes of the works and the provision of services.

Compliance with mandatory requirements must be guaranteed by:

- The guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and mandatory prescriptions in general at a local, national, European and international level);
- The implementation of an effective and efficient Quality Management System;
- The extended approach to "Risk Management" in order to anticipate and minimize the effects of technical and economic-financial risks and to enhance the opportunities for improving competitiveness;
- The continuous search for the satisfaction of the Client's expectations and all interested parties;
- The extended and continuous control of the entire production process through accurate and detailed planning and the implementation of the best quality assurance and verification techniques;
- Research and development of innovative technologies to optimize the quality of products and processes;
- The use of adequate and qualified resources to develop, maintain and disseminate the culture of quality in the Company organization.

1.2 Environmental Policy

Environmental protection is a priority for BIF which pursues the objectives of "**zero environmental incidents**" and "**zero pollution**".

The mission of BIF is to safeguard the environment, through the continuous analysis of the significant aspects to prevent possible impacts and using raw materials in a rational and sustainable way, favoring, where possible, recovery and/or recycling, encouraging the development and use of innovative technologies both in the design phases and in the construction phases of the works.

BIF has adopted an Environmental Management System which is a guide for the continuous improvement of environmental performance and the development of sustainability.

The environmental commitment of BIF manifests itself through:

- The guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and mandatory prescriptions in general at a local, national, European and international level);
- The availability of adequate resources to guarantee the effective implementation of the Environmental Management System;
- The prevention of local pollution, working on the direct and indirect impacts that can be controlled and / or influenced by the typical operations of its production processes and applying an extended approach to "Risk Management";
- The mitigation of negative impacts on surrounding communities;
- The containment and constant reduction of the consumption of water resources and raw materials;
- The containment and reduction of waste production through recovery and recycling processes;
- The containment and reduction of energy consumption in order to minimize greenhouse gas emissions;
- The creation of works whose use is not dangerous for the health and safety of end users and all interested parties;
- The creation of works that have the highest possible rate of recyclability at the end of their life; the application of the most modern and appropriate technical and organizational measures to protect and preserve ecosystems and biodiversity;
- The management and reduction of hazardous chemicals;
- Continuous training of personnel in order to increase environmental awareness and consequently prevent accidents and potential negative impacts.

1.3 Occupational Health and Safety Policy

The health and safety of workers are fundamental for BIF which pursues the **objectives** of "**damage zero** " and "**zero incidents**".

BIF has adopted a rigorous, adequate and effective Health and Safety Management System aimed at constantly improving performance and seeking sustainability through the implementation of an extended approach to "Risk Management".

The commitment of the BIF to guarantee the health and safety of all personnel is manifested through:

- The guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and mandatory prescriptions in general at a local, national, European and international level);
- The promotion of a culture of safety, placing preventive measures before protective measures;
- The creation and maintenance of healthy and safe working conditions in the context of a work environment characterized by the maximum technologically feasible safety, meaning the maximum technical, organizational and procedural safety;
- The guarantee of constant and punctual health surveillance in agreement with the competent physician;
- The contrast with all available means, albeit in compliance with the laws and mandatory regulations, of any behavioural excess, with particular attention to smoking and the use of narcotic and alcoholic substances, in the workplace or while carrying out responsibilities and activities of personnel;
- Detailed analysis of production activities to identify risks and prevent events;
- The implementation of all measures capable of minimizing the probability of accidents, injuries and occupational diseases;
- The use of innovative technologies and production processes, adequate and qualified resources;
- The involvement and consultation of workers and, where established, of Workers' Representatives, on matters relating to Health and Safety, making them active participants;
- Continuous training of workers and the implementation of a constantly updated information, instructions and supervision system to integrate a positive health and safety culture;

BIF guarantees and encourages consultation and participation of the Workers and, where established, of the Workers' Representatives, on matters relating to Health and Safety;

1.4 Sustainability Policy

The mission of BIF is to build excellence in a sustainable and innovative way.

Conducting its industrial activity, BIF acts in full respect of human rights, in accordance with the principles:

- Of the **UN Universal Declaration of Human Rights**;
- Of the **United Nations Global Compact**;
- Of the **Charter of Fundamental Rights of the European Union**;
- as well as in compliance with any specific legislation in force in the countries in which it operates.

BIF works with its Clients, partners and suppliers to create works/products with the requisites suitable for creating social and economic value for the communities in which it operates.

The commitment to this goal is made in the most responsible way possible towards the environment and society and is manifested through:

- The guarantee of respect and compliance with all mandatory requirements (laws, standards, contractual obligations, regulations, directives and mandatory prescriptions in general at a local, national, European and international level);

- Full respect for the human rights of all employees and other parties involved in the operations; maximum interaction with all stakeholders and proactive listening to the legitimate expectations of local communities so that the works created leave a positive legacy following their completion;
- The utmost effort to ensure health, well-being and safety at the highest standards in all workplaces and to promote the culture of "damage zero", as indicated in the Health and Safety policy;
- The continuous evaluation and promotion of equality and inclusion in the workforce; ♦ “zero” tolerance towards discrimination or inappropriate behaviour;
- the constant search for the development of personnel skills;
- The adoption of eco-design principles in projects.

1.5 Sustainable Procurement Policy

The mission of BIF is to build excellence through a sustainable and ethical supply chain.

The commitment of BIF to provide sustainable results, through the works and products it produces, extends beyond the boundaries of operations aimed at the supply of materials, works or services provided by third parties.

To this end, where relevant and proportionate, in collaboration with the designers and partners of the supply chain, BIF intends to develop:

- Ethical sourcing through the formal request for acceptance and signature by suppliers of ethical and anti-corruption principles;
- The efficiency of resources, the minimization of waste and the preferential use of materials, products and services that favor the benefits of the circular economy;
- Collaboration with suppliers who actively manage their impact on habitats and the environment in order to promote the conservation of biodiversity and environmental protection;
- The application, where possible, of innovative eco-design principles to projects with the aim of minimizing the impacts associated with the procurement of materials and energy.

1.6 Human Resources Management Policy

BIF considers, also in relation to its type of business, Human Resources as the main value, the main competitive and development factor of its business.

Top Management provides and promotes active leadership that fosters trust, openness and collaboration in order to facilitate and support a healthy and inclusive working environment and a correct enhancement of personnel based on principles of transparency and meritocracy.

The commitment of BIF is aimed at attracting, retaining and promoting talented human resources through:

- Guaranteeing the best working conditions for all employees, granting rates and working hours in line with the relevant national collective agreements and providing specific social assistance;
- Adequate training and development plans (career management) in order to offer its employees, the best development tools necessary to realize their potential;
- Creation and development of technical skills, based on Company trends and values;
- Maintaining a constant and respectful dialogue with employee representatives and social partners in order to ensure a favourable working environment based on collaboration and communication;

- The assurance of fair and adequate remuneration; the promotion of health, safety and well-being in the workplace, according to its own health and safety policy;
- "Zero" tolerance towards any kind of discrimination regarding age, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or personal beliefs or sexual orientation.

BIF, by Company choice, formally declares that it never, in any way and in no case, recourses to child labour.

BIF hires only and exclusively staff of age and firmly opposes forced labour and any form of work contrary to:

- Human rights;
- Current legislation;
- The agreements signed with the social partners.

BIF offers its human capital equal opportunities and is committed to supporting a healthy culture of collaboration in which people can freely express their opinions in the context of corporate values.

BIF encourages its employees to directly and informally address any behavioural or relational problem through discussion and conciliation. However, he reiterates that in no case are inappropriate behaviours in the workplace tolerated such as for example:

- Discrimination and harassment of an individual on grounds of age, disability, ethnicity, gender, religion, political beliefs, sexual orientation, marriage and civil union, pregnancy and motherhood;
- Insults, comments, social isolation, physical acts, defamation, intimidation or emotional manipulation;
- Bullying that is likely to defame, offend, belittle, degrade, intimidate or deliberately humiliate a person;
- Unequal treatment;
- Harassment or conduct that creates a hostile or intimidating environment, adversely affects a person's participation or commitment;

To all employees of BIF is guaranteed access to an internal complaint system (whistleblowing) which allows them to report any type of discrimination or inappropriate behaviour in the workplace, guaranteeing the reporting subjects the protection from any retaliatory action.

1.7 Anti-Corruption Policy and Anti-Competitive Practices

BIF adopts a firm and absolutely forbidden approach to any form of corruption and market distortion.

BIF formally expresses the absolute obligation to strictly comply with all laws, rules and regulations in the field of fighting corruption and extortion in Switzerland, Nigeria and in all the countries in which the Company operates.

BIF undertakes to conduct its commercial activities and its business in such a way as to never be involved in any corruption case in order to avoid any involvement in illegal situations, both in relations with public entities and with private entities.

BIF is firmly committed to develop its business according to ethical principles and fair competition within the market in which it operates, counteracting any distortion of the same, such as by way of example and not limited to:

- Commercial fraud;
- Money laundering;

- Social dumping;
- Conflict of interest.

In particular, it is absolutely forbidden to all employees or collaborators:

- Offer, promise, give, pay or authorize someone to give or pay, directly or indirectly, money or other economic advantage, utility or benefit of any kind for illegal purposes;
- Accept the request or authorize someone to accept or solicit, directly or indirectly, a payment or an economic advantage or other benefit from public or private entities;
- Receive or obtain the promise of money or other benefits, for oneself or for others, to carry out or omit acts in violation of the obligations inherent in their office or the obligations of loyalty.

All the limitations described concern not only cash payments but also any utility, even indirect, such as, by way of example: gifts; contributions to associations or sponsorships; commercial activities, jobs, professional or consulting assignments; investment opportunities; confidential information relating to the market or products; discounts or deferred payments; courtesy expenses to third parties such as hospitality, meals, transport, entertainment.

To all employees of BIF is guaranteed access to an internal complaint system (whistleblowing) that allows them to collect any type of report relating to Company operations, guaranteeing the reporting subjects the protection from any retaliatory action.