

SOCIAL RESPONSIBILITY POLICY

The Social Responsibility Policy identifies the following PRINCIPLES on which the Social Management commitment of HQBuild S.p.A. is based:

1. SOCIAL COMMITMENT

HQBuild S.p.A. is committed to fully complying with the requirements of PAS 24000:2022 and to promoting socially responsible conduct at every stage of its activities, both internal and external. It actively engages all stakeholders — employees, suppliers, subcontractors, clients and local communities — so that they share the same values of ethics, legality and respect for the individual, and it is committed to providing mandatory periodic training on human rights, health & safety, anti-corruption and the principles of this Policy to employees and partners, according to their role and level of risk.

2. CHILD AND FORCED LABOUR

HQBuild S.p.A. does not use or tolerate the employment of child or forced labour. All employment relationships are based on free will and compliance with national laws. The Organisation carefully verifies the age of its workers and requires its suppliers to adopt the same principle.

3. HEALTH AND SAFETY ON CONSTRUCTION SITES

In the sector of construction, renovation, restoration and building maintenance, building completion works and construction works in general, occupational safety is an essential value.

HQBuild S.p.A. adopts all the measures necessary to prevent accidents and protect workers' health, in compliance with Italian Legislative Decree 81/2008, with its own Occupational Health and Safety Management Policy implemented in accordance with UNI EN ISO 45001:2018, and with the applicable legislation. Every construction site is managed with rigorous safety controls, continuous staff training, use of personal protective equipment and constant monitoring of environmental and operating conditions.

The commitment to safety also extends to suppliers and subcontractors, who are required to comply with the same rules and standards.

4. FREEDOM OF ASSOCIATION AND DIALOGUE

HQBuild S.p.A. recognises and respects the right of all workers to freely establish and join trade union organisations and to take part in collective bargaining. It promotes an environment open to dialogue and cooperation, based on mutual respect and transparency.

5. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

HQBuild S.p.A. is committed to ensuring an inclusive working environment, free from discrimination based on age, gender, ethnic origin, religion, opinions, disability or personal orientation. All decisions concerning recruitment, training, promotion and remuneration are based exclusively on skills, professionalism and results. The same principles are required of suppliers and business partners, so that the entire supply chain operates in full respect of human dignity.

6. WORKING HOURS AND REMUNERATION

HQBuild S.p.A. fully complies with the regulations in force concerning working hours, rest periods and holidays, ensuring a balance between professional and private life. Workers' remuneration is fair, punctual and consistent with the national collective agreements for the construction sector. It also ensures that all workers, including subcontractors, receive decent economic treatment, proportionate to the tasks performed.

7. ETHICAL CONDUCT AND INTEGRITY IN BUSINESS RELATIONS

HQBuild S.p.A. rejects any form of corruption, fraud or abuse of power. It encourages whistleblowing practices and anonymous complaints. In its relations with clients, suppliers, and public and private bodies, it is committed to operating with honesty, transparency and a sense of responsibility. All business partners are also selected on the basis of their ethical conduct and compliance with the principles of PAS 24000:2022.

8. MANAGEMENT SYSTEM AND CONTINUOUS IMPROVEMENT

HQBuild S.p.A. has appointed a Social Management Representative (RGS), responsible for ensuring compliance with PAS 24000:2022, monitoring social performance and promoting continuous improvement. Periodic internal and external audits are carried out to verify the effectiveness of the policies adopted. Any reports or non-conformities may be submitted anonymously and are handled with the utmost confidentiality, without any retaliation against those who submit them.

9. ENGAGEMENT OF SUPPLIERS AND CLIENTS

Social responsibility extends along the entire value chain.

HQBuild S.p.A. works with suppliers and subcontractors who share the ethical and social principles set out in PAS 24000:2022 and promotes awareness of these issues through communication, meetings and periodic checks. Likewise, it is committed to guaranteeing its clients the utmost transparency, reliability and respect for the principles of sustainability and responsibility.

This Policy is reviewed annually or whenever regulatory or process changes occur, or following significant reports. It is communicated and disseminated to all personnel through the company network and by posting on the dedicated notice board, and to all interested parties through publication on the company website.

Date: 19/01/2026

HQBUILD S.p.A. Top Management