

Policy on Combating Addictions and Risk Behaviours related to alcohol, narcotic, psychotropic or psychoactive substances, and gambling

In accordance with the Company's Internal Regulations and Disciplinary Code, the Code of Ethics and Conduct, and the commitments made in the area of occupational health and safety and corporate social responsibility, M.M. srl a socio unico (hereinafter M.M.) promotes a healthy, safe, respectful workplace oriented towards the well-being of all workers.

This Policy defines M.M.'s commitment to **combating addictions and risk behaviours, with particular reference to the consumption of alcohol, the use of narcotic, psychotropic or psychoactive substances, and gambling**, with the broader objective of promoting workers' health and preventing risk situations.

The misuse of alcoholic beverages, the use of drugs, and gambling may compromise a person's health, impair attention, reflexes and risk assessment capacity, negatively affect the quality of working relationships, increase the likelihood of accidents, and reduce individual and collective well-being.

M.M. recognises these behaviours as **risk factors for health, safety and the organisation of work**.

M.M. – A Workplace Free from Addictions and Risk Behaviours

M.M. prohibits the consumption of alcoholic beverages, narcotic, psychotropic or psychoactive substances before and during the performance of any work activity that could produce effects during work or compromise the safety of the worker, colleagues, third parties, clients, suppliers or the working environment.

This prohibition also applies during breaks, business trips, external activities, activities at third-party sites or worksites, use of company vehicles, forklifts, handling equipment, machinery, plant and work tools.

M.M. further prohibits the carrying out, promotion or organisation of gambling activities within company premises, during working hours, using company tools, or in any context attributable to work activity.

These prohibitions are intended to protect the health and safety of all those who work at or access M.M.'s premises, and to ensure a safe working environment.

Rules of Conduct

Specifically, the following are prohibited:

- consuming alcoholic beverages during working hours, breaks, business trips, external activities, or before the start of work activity when the effects may persist during work;
- reporting to work in a state of psychophysical impairment, even suspected, due to alcohol, narcotic, psychotropic or psychoactive substances;
- taking, possessing, transferring, distributing, selling, introducing or consuming narcotic, psychotropic or psychoactive substances on company premises or during activities carried out on behalf of M.M.;
- using machinery, plant, equipment, company vehicles or work devices in an altered or unsafe psychophysical condition;
- engaging in, organising, facilitating or promoting gambling, betting or similar activities on company premises, during working hours or by means of IT tools, networks or company devices;
- inducing colleagues, collaborators or third parties to take part in gambling activities or to provide money loans connected with such activities.

Furthermore:

- the possible use of prescribed medications that may affect attention, alertness, reflexes or the ability to carry out one's duties safely must be managed responsibly by consulting the Occupational Health Physician exclusively.
- during working dinners, corporate events, social gatherings with clients, suppliers, consultants or other external parties, as well as during business trips or activities otherwise attributable to corporate representation, all participants are required to maintain behaviour that is responsible and respectful of M.M.'s safety and image.

The presence of alcoholic beverages does not authorise any behaviour contrary to this Policy. In any case, the consumption of alcohol is prohibited for anyone who subsequently needs to drive company or private vehicles for work purposes, return to company premises or workplaces, perform work activities, use machinery, plant,

vehicles or equipment, or who is on call or in a position of operational responsibility.

Objectives

The general objective of this Policy is to **support the right to health and prevent the risks associated with addictions in the workplace.**

In particular, M.M. undertakes to pursue the following specific objectives:

- prevent risk situations arising from the consumption of alcohol, narcotic, psychotropic or psychoactive substances;
- prevent gambling-related behaviours that may compromise health, personal well-being, relationships among colleagues, safety and the proper performance of work activities;
- promote awareness of the health, social, relational and professional risks associated with addictions;
- protect the health and safety of workers, collaborators, visitors, suppliers and all those who access M.M.'s premises or workplaces;
- reduce the risk of accidents, incidents, operational errors, unsafe behaviours and damage to people, property, plant, vehicles and equipment;
- facilitate access to support and care pathways for persons experiencing difficulties or issues related to alcohol, narcotic substances or gambling.

Applicability

This Policy applies to all workers (employees and agency workers) and contractors operating in:

- the **indoor company premises**, such as offices, meeting rooms, corridors, production facilities, warehouses, storage areas, toilets, refreshment rooms and communal areas;
- the **outdoor areas pertaining to the company** (transit areas, storage areas, green spaces, etc.);
- the **areas used for external activities** for any reason (rented spaces, worksites, exhibition stands at trade fairs, etc.);
- in **all company vehicles**, including rental vehicles (cars, vans, forklifts, self-propelled stackers, etc.).

Any violations of this Policy will be assessed and managed in accordance with the nature of the relationship with the Company and the applicable disciplinary, regulatory or contractual instruments.

High-Risk Duties, Health Surveillance, Preventive Measures and Checks

For duties identified by current legislation, pursuant to Article 125 of Presidential Decree 309/1990 and the State-Regions Conference Agreement of 18 September 2008 as amended, M.M. applies the provisions in force regarding health surveillance, fitness assessments, verification of the absence of alcohol dependency and verification of the absence of use of narcotic or psychotropic substances, pursuant to Article 41 of Legislative Decree 81/2008 as amended.

Any health checks are carried out exclusively by the Occupational Health Physician and, where required by law, by the health personnel of the occupational health and safety services with competent territorial supervisory functions, in accordance with the applicable regulatory framework and the provisions referred to above. These activities are carried out with respect for the dignity of the person, confidentiality, professional secrecy, and applicable data protection and privacy regulations.

Where there are reasonable grounds to believe that a worker assigned to high-risk activities is under the influence of alcohol or narcotic or psychotropic substances before or during a work shift, the medical examination provided for by health surveillance regulations may be activated.

In any case, in the presence of even suspected psychophysical impairment, abnormal behaviour, immediate safety risk, or an incident, the Company may adopt proportionate and timely precautionary measures such as temporary removal from the specific activity, suspension from the use of vehicles or equipment, and involvement of the supervisor, the Health, Safety and Environment Manager, the Occupational Health Physician and other competent company functions.

Such measures serve a preventive and health-and-safety protection purpose, without prejudice to any disciplinary assessment.

This Policy will be updated in the event of regulatory changes, State-Regions agreements or instructions from competent Authorities that affect the methods of assessment, health surveillance or management of high-risk duties.

Prevention, Awareness-Raising and Health Promotion

M.M. undertakes to support this Policy with **information and awareness-raising activities directed at workers**, aimed at:

- increasing awareness of the risks associated with alcohol, narcotic substances and gambling;
- promoting responsible behaviour;
- facilitating the early identification of situations of difficulty;
- combating stigma, isolation and underestimation of the problem;
- facilitating access to help and support pathways.

Information, awareness-raising, prevention and guidance activities on support services may be carried out through internal communications, information meetings, educational materials and initiatives linked to the workplace health promotion programme.

Support Pathways

M.M. recognises that issues related to alcohol, substances and gambling may require specialist support and care pathways.

M.M. in-house support: any worker who believes they have a difficulty related to addictions is encouraged to seek help promptly by contacting the Occupational Health Physician in confidence (mobile: 335/5784281, also via WhatsApp).

At M.M., a voluntary request for help is regarded as responsible behaviour and will be handled with care, confidentiality and respect for the dignity of the person.

The Company may facilitate access to care, prevention, counselling or specialist support pathways.

Local reference services: any worker who believes they have a difficulty related to addictions may contact the relevant local services directly.

Among the reference services in the Udine area: **ASUFC, Via Pozzuolo 330, Udine** (Mid-Friuli Addictions Area – Alcoholology Service, Gambling Disorder Outpatient Clinic, Technological and Behavioural Addictions) www.asufc.sanita.fvg.it

Monitoring, Reporting and Continuous Improvement

Senior Management, with the support of the Safety Managers, the Occupational Health Physician, supervisors and the company functions involved, ensures the monitoring of the effectiveness of this Policy and promotes continuous improvement.

Anyone who identifies situations that may constitute a risk to compliance with this Policy is required to report them promptly to their line manager, the Safety Managers, the supervisor, the RSPP, the ASPP, Senior Management or other company channels as provided for.

Reports will be handled with confidentiality, in accordance with the dignity of the persons involved and applicable legislation.

Consequences of Violations

Violation of this Policy constitutes non-compliance with company provisions and may result in the adoption of disciplinary measures.

Depending on the severity of the conduct, the duties performed, the risk generated, any recurrence, and the consequences for people, property, plant, vehicles or the company's image, precautionary measures aimed at ensuring immediate safety or disciplinary sanctions may be adopted.

By way of non-exhaustive example:

- verbal or written warning;
- suspension from the activity or from the specific duty;
- suspension from the use of vehicles, machinery or equipment;
- temporary removal from company premises, the worksite or the workplace;
- further disciplinary measures provided for by Article 7 of Law 300/1970 (Workers' Statute), the Company's Internal Regulations and Disciplinary Code, the applicable National Collective Labour Agreement (CCNL) and other applicable legal provisions, up to and including dismissal in the most serious cases or where the relationship of trust is irreparably compromised.



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soggetta ad attività di direzione
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Communication

Communication of this Policy is guaranteed through all available company channels, including the company website, internal communications, notices in strategic locations, information meetings and awareness-raising materials.

M.M. promotes ongoing dialogue with all company staff to strengthen a shared culture of health, safety, responsibility, legality and respect for the person.

Udine, 24 June 2026

Signed by the Legal Representative
Emanuel Morandini