

DEFREMM S.p.A. operates **in the design and production of metal fasteners and special parts through cold forming**, serving regulated markets with high safety and reliability requirements such as **automotive, aerospace & defence, ammunition, and industry**

Top Management defines and maintains this Policy as the **strategic guideline of the Integrated Management System**, in compliance with the requirements of:

- UNI EN ISO 9001:2015
- IATF 16949:2016
- UNI EN ISO 14001:2015
- UNI EN 9100:2018
- UNI/PdR 125:2022 (Parità di genere)

This Policy is consistent with the **organizational context**, the **needs and expectations of interested parties**, and the **company's strategic objectives**.



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STRATEGIC COMMITMENTS OF TOP MANAGEMENT

1. Leadership, responsibility, and quality culture

Top Management commits to:

- exercising active leadership over the Management System;
- promoting a **culture of quality, product safety, and risk prevention**;
- ensuring that responsibilities, authorities, and roles are clearly defined and understood;
- supporting the principle “**do it right the first time**”.

2. Product conformity and customer satisfaction

DEFREMM S.p.A. commits to:

- ensuring **full compliance with contractual, regulatory, and statutory requirements**;
- ensuring **design integrity** and compliance with technical specifications and special requirements;
- meeting the expectations of OEM, Tier 1, and Tier 2 customers in terms of **quality, reliability, delivery performance, and technical support**;
- preventing defects and nonconformities through a **preventive and risk-based approach**.

3. Process approach and risk-based thinking

The company commits to:

- managing activities according to a **process-based approach**;
- identifying, assessing, and mitigating **risks and opportunities** that may impact:
 - product conformity,
 - product safety,
 - operational continuity,
 - customer satisfaction;
- using analysis and prevention tools (e.g. FMEA, operational and environmental risk analysis).

4. Product Safety and aerospace / automotive requirements

DEFREMM S.p.A. recognizes **product safety as an absolute priority** and commits to:

- ensuring product integrity throughout the entire product lifecycle;
- properly managing:



- special and critical requirements,
- PPAP,
- FAI / FAIR,
- product configuration,
- full traceability of materials, processes, and batches;
- ensuring **data retention** in accordance with applicable requirements;
- preventing risks arising from human error through **Human Factors management**.

5. Competence, awareness, and employee involvement

Top Management commits to:

- ensuring that personnel are **competent, trained, and aware** of their impact on product quality, safety and environment;
- promoting operational discipline, accurate record-keeping, and compliance with procedures;
- supporting professional growth and individual accountability.

6. Suppliers and supply chain

DEFREMM S.p.A. commits to:

- selecting, evaluating, and monitoring suppliers based on criteria of:
 - quality,
 - reliability,
 - regulatory compliance,
 - sustainability;
- ensuring the **flow-down of technical, quality, and regulatory requirements** throughout the supply chain;
- **preventing the introduction of counterfeit products** or components through supply chain control and traceability of critical supplies;
- preventing supply risks and ensuring **supply chain continuity**.

7. Environmental protection and sustainability

The company commits to:

- complying with applicable environmental regulations and existing permits;
- preventing pollution and reducing environmental impacts;
- improving energy efficiency and resource usage;
- integrating climate and **environmental impact** assessments into strategic planning;
- supporting customers' and supply chain ESG requirements.



8. Health, safety, and work environment

DEFREMM S.p.A. commits to:

- ensuring **safe and healthy working environments**;
- preventing injuries, accidents, and occupational diseases;
- managing emergencies and ensuring **Business Continuity**;
- promoting responsible and safe behaviors.

9. Gender equality, ethics, and social responsibility

The company commits to:

- ensuring **equal opportunities**, non-discrimination, and the enhancement of diversity;
- applying the principles of **UNI/PdR 125** within HR processes;
- promoting organizational well-being, work-life balance, and ethical conduct.

10. Continuous improvement

Top Management commits to:

- defining **measurable targets** consistent with this Policy;
- monitoring performance through indicators (KPIs);
- periodically reviewing the effectiveness of the Integrated Management System;
- allocating adequate resources for continuous improvement.

COMMUNICATION AND IMPLEMENTATION

This Policy:

- **is communicated, understood, and applied** at all levels of the organization;
- is made available to **interested parties**;
- serves as a reference for defining company objectives.

Lecco, 07/01/2026

For Top Management
DEFREMM S.p.A.

CEO / General management
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