

The **Company policy of Società Cooperativa Culture** (CoopCulture) represents the reference framework for establishing the objectives for the Integrated Management System regarding the quality of the services offered, Corporate Social Responsibility, gender equality, health and security at work, environmental sustainability, information security and privacy, the prevention of the corruption. The use of the masculine form in this statement is solely for the sake of readability and effective communication of the text.

Service quality

The creation and implementation of the company management system is particularly important because:

- Has implication on the effectiveness and efficiency of the organization;
- Urges process-based management and the adoption of a philosophy of continuous service improvement;
- Offers a company image that is more credible and reliable for its client and end users;
- Needs a systematic approach to prevent critical issues and to improve the performances of all those working on back office and, above all, the front line roles.

The application of voluntary standard requirements requires, from its implementation:

- A critical rethinking of working methods;
- Improvement on the management of the company structure;
- A change, mostly cultural, regarding the daily work, the performance required, and in terms of respecting the clients needs.

Regarding the quality of the services offered to its clients CoopCulture aims to:

- Improve the quality and variety of services offered to the public, exploiting all the potential for development that comes from integrating culture and tourism and between cultural heritage and the local area;
- Create innovative initiatives to bring the public closer to the art by using the resources offered by the best technologies;
- Develop the idea of communicating cultural heritage as a factor of social integration for the local community including all its components: families, young people, children, the elderly, immigrant communities;
- Create value in a way that is responsible and sustainable while spreading knowledge of the cultural/ economic and social heritage.

In conclusion, the investment for the creation and implementation of an ISO 9001 certified management system arises from the desire to achieve an effective and efficient organization that allows the improvement of the work processes of all those who revolve around the company: from members, to employee, collaborators, suppliers, in order to best meet the needs of customers, clients and end users, improve working methods, control critical issues and enhance the company's image and competitiveness.

Corporate Social Responsibility

The Policy defines the principles adopted by CoopCulture in the area of social responsibility, with particular regard to the working conditions of worker members and collaborators.

The SA 8000 certified management system guides the cooperative in complying with the requirements of the international standard, which are summarised as follows:

- The refuse of child labour and forced labour;
- The protection of health and security at the workplace;
- The freedom of association and the right to collective bargaining;
- The defence against discrimination in the workplace and the abuse of disciplinary procedures.

The cooperative recognises the ISO 26000 Guidelines on Social Responsibility as an important source of inspiration for ensuring that ethical and socially responsible behaviour becomes a habit and an effective company attitude at every level.

The principles apply concretely to all the categories

The principles apply in practice to all categories towards which and with which the company conducts its business, in other words, to all (stakeholders): workers, customers, clients, suppliers, partner, competitors, reference community and territorial realities in which we operate.

Working in a positive climate (people satisfaction) contributes to the correct functioning of the cooperative. CoopCulture has taken the necessary measures to offer decent living conditions and a safe working environment for all workers and is constantly committed to promoting a climate of respect and trust in relations "with" and "between" its employees.

This principles also apply towards our suppliers, partners and competitors through the reciprocity of fair conduct, equity, impartiality in negotiations and compatibility with the Cooperative's ethical principles.

CoopCulture interacts with the communities and the territorial realities in which it operates – respecting the environment and the cultural diversities, communicates and informs openly about its achievements, cooperates with civil society humanitarian, social and cultural sector; encourages its employees and collaborators to play an active role in supporting the community and sustainable development.

CoopCulture is committed to its employees to:

- Providing continuity of employment, under the best professional conditions, paying attention to individual needs;
- Encouraging the active participation of the members to the life of the cooperative enforcing the internal communication and opportunities for exchange;
- Offering all employees equal opportunities for professional and career growth;
- Carry out the necessary risk assessments in the workplace and provide adequate training/information on health and safety
- Establishing transparent relationships;
- Treat personal data with the utmost discretion;
- Adopting good practices that increase, when necessary, the degree of work-life balance.

Gender equality

CoopCulture is committed to enhance gender diversity and to ensure equal opportunities for men and women, adopting appropriate measures and interventions to prevent all form of discrimination, including through language.

The top management has nominated a Steering Committee to:

- systematically train and inform stakeholders on equal opportunities issues, in order to contribute to the dissemination of a culture of diversity;
- Create a working environment free from any kind of direct or indirect discrimination and from any harmful behaviour based on personal, social, political or cultural diversity by adopting a zero tolerance approach to all form of violence against people, including sexual harassment in all its forms;
- Adopt specific personnel management procedures aimed at ensuring equity in all phases of the employment relationship, from the recruitment process, the role assignment, career management, parental and care leave management, professional assignment and development, pay equity and termination of the employment;
- Ensure balance between professional and private life, developing programs and initiatives for parenting and care and for work-life balance;
- Prepare internal and external communication plans focused on gender equality, promoting diversity and support female empowerment, in line with the values and culture of the cooperative;
- Ensure that the communication strategy is always responsible, i. e. careful to avoid gender stereotypes, promoting a positive image of women and girls, using language that respects diversity and gender differences.

To ensure continuity and effectiveness on what declared, CoopCulture has developed a Gender Equality Management System in accordance with the UNI PdR 125:2022, which requires the formalization of a Strategic Plan for gender equality. This document set the goals that are necessary to achieve annually what declared above and the Key Performance Indicators defined by the standard.

Values and principles regarding health and security at work and the environment

CoopCulture has the highest consideration of the environment and the health and security of its

employees and of all the people who frequent the workplaces managed by the Cooperative. The fundamental principles of the ISO 45001 and ISO 14001 Integrated Management System that CoopCulture follows are:

- Continuos improving of the environmental performance and the health and security conditions at work, the effort to improve the environmental performances and the prevention of the accidents and occupational diseases;
- Adequate and punctual assessment of the environmental impacts and health and safety risks at work and the related planning of safety measures;
- Compliance with legal standards (legal compliance), as a minimum requirement, and the adoption of a Management System that will exceed these requirements;
- Attention to the development of the skills and knowledge of its employees, including through the planning and implementation of information, training, periodically updating courses, communication, engagement and consultation with the employees and their representatives.

With particular regard to environmental impacts, the organization carefully takes care of the waste management, the winter/summer air conditioning systems for the premises and the consumption of electricity and water resources.

Aware that the major health and safety risks and environmental impacts occur in emergency conditions, we pay particular attention to staff training and conducting appropriate drills.

Information Security

Since CoopCulture's staff represents the frontline for visitors in the cultural sites, every effort is made to provide (by telephone and online) accurate information in terms of access and enjoyment of the cultural sites in every language, in a transparent way and ensuring availability in all situations.

While respecting the guidelines of the client, CoopCulture's staff, thanks to the technological tools (Ticketing information system first and foremost), ensure the correct management of the admission process that consent the access and the fruition of the visitors and referring professional and organised fruition to specialized processes. To ensure that CoopCulture acts in a integrated/coherent way with the other entities present in the cultural sites (management, surveillance, security services) and the guidelines already provided to the users (on-site, online from the client).

CoopCulture complies to ensure the maximum protection, in terms of privacy, integrity and availability of the information produced, elaborated, received and transmitted during the phase of reservations and sellings to ensure the protection of the needs of the client regarding the brand image of the cultural sites.

To ensure the protection and the security of the information, CoopCulture has adopted a ISO 27001 integrated management system and a process for the evaluation and treatment of the correlated risk. The risks to the security of information managed by staff in their areas of technical and organisational competence (bookings, ticketing and related information management) were therefore identified, quantified and qualified. Consequently has been identified the possible threats and the linked vulnerability, including the probability for them to occur.

Has been assessed the necessary countermeasures to reduce the risk to an acceptable level for the users and the clients. The areas of competence for risk assessment and management are fully consistent with CoopCulture's organisational boundaries, as set out in the contractual documents. However, the process involves constant dialogue with parties outside these boundaries in order to ensure maximum protection of the security of the information managed.

The countermeasures to combat information security risks involved aspects related to organisation, management processes, staff selection and training, as well as the sharing of practices and periodic and planned activities. In relation to the context of great cultural and historical value in which CoopCulture operates, the organisational and technical tools necessary to make countermeasures to combat information security risks effective have also been identified.

Data Processing and Protection Policy

CoopCulture, as data controller, while operating its operational and administrative activities, processes personal data relating to data subjects involved in the administration of its own and

third part services, as well as data relating to customers, suppliers, web users, candidates, employees and other third parties. Related to the processing mention above the data controller comply to the European Regulation (EU) 2016/679, Legislative Decree 196/2003, Measures and Guidelines issued in application of the legislation on the protection of personal data.

To encourage trust and quality among its stakeholders the Cooperative has adopted an organisation whose objective is to create the conditions for compliance with procedures and has nominated a Data Protection Officer (DPO) who can be contacted at dpo@coopculture.it to respond promptly to requests made by data subjects, as required by current measures.

Regarding the processing operations the company is committed that its staff and anybody who operates for CoopCulture complies with the so-called 'accountability' of the data controller set out in the European Regulation, i.e. through an accountability process based on:

- Organisational measures;
- Technological measures;
- Minimisation and impact assessment;
- Conservation;
- Data quality.

Coopculture has always been committed to complying with the principles applicable to the processing of personal data, first and foremost that personal data be processed lawfully, fairly and transparently in relation to the data subject (lawfulness, fairness and transparency). A procedure was therefore implemented for the assessment of processing operations and the production of appropriate information notices that precisely identified the legal basis for the processing which, if based on consent, would trigger the acquisition of appropriate consent and related indexing procedures, as well as procedures for exercising the right to withdraw consent.

The essential elements relating to the information to be provided to the data subject at the time of data collection are identified as follows:

- the purpose of the processing must be determined, explicit and legitimate;
- the retention period after assessing its duration so that it meets the requirement of compatibility with the purposes pursued;
- any recipients or categories of recipients to whom the data undergoing processing are disclosed;
- intention to transfer data to foreign countries with reference to appropriate or suitable safeguards based on the degree of reliability of the countries concerned;
- Ensure that the data subject is informed about its right to access their personal data and the possibility lodging a complaint with a supervisory authority;
- The right to withdraw its consent;
- provide an indication of the legal basis for the processing;
- if the processing involves automated decision-making process, including profiling, provide adequate information highlighting the expected consequences for the data subject;

CoopCulture is aware of the general prohibition of processing special categories of personal data except in cases relating to the explicit consent of the data subject, in cases where processing is necessary to fulfil the obligations and exercise the specific rights of the controller or data subject in the field of labour law and social security and social protection, to the extent authorised by Union or Member State law or by a collective agreement pursuant to Member State law, subject to appropriate safeguards for the fundamental rights and interests of the data subject. Other cases may be to ensure, exercise or defend a right in court or when the processing is relevant to a public interest.

The use of data for marketing purposes by CoopCulture will pay particular attention for the elaboration of the informative, on the procedure to the processing of information, the procedure for providing it to the data subject and the collection of consent in OPT-OUT or OPT-IN mode, but only in the cases provided for by the specific Provision of the Authority with reference to so-called 'soft spam'. The acquisition of consent will always be governed by an adequate indexing process and the right of revocation of the data subject will always be facilitated. Regarding the data processed from its own web platform will be complied with the specific measures, in particular the "Cookie Guidelines and other processing tools"

Corruption Prevention Policy

The Boards of Directors of CoopCulture, in accordance with the principles dictated in the Code of Ethics attached to the organisational, management and control Model pursuant to Legislative Decree 231/01, is committed to pursuing a policy of transparency and fairness in its relations with stakeholders, including supervisory bodies and public entities in general, and to combating the risk of illegal practices at all levels.

In order to ensure compliance with the law and applicable regulations and/or rules, CoopCulture has defined in this Anti-Corruption Policy the principles and the following rules of conduct, addressed to its employees and collaborators:

- Absolute prohibition of any behaviour that can be constituted as corruption or attempted corruption towards public officials, public service employees or any other person connected with them, or private individuals, in any form or manner;
- In relations with third parties, employees must behave with the utmost fairness and integrity, avoiding even the slightest impression of seeking to improperly influence decisions or request favourable treatment (whether by acting in favour of or failing to act);
- Commitment to implement measures to ensure that no CoopCulture employees are involved in cases or attempts of passive corruption (i.e. originating from outside the organisation);
- It is prohibited to offer, directly or indirectly, through intermediaries, sums of money or other benefits to public officials or public service employees, or to persons closely connected with them and/or to private individuals, in order to influence them in the performance of their duties.
- It is prohibited to offer, pay, promise undue compensations, offers, gifts or preferential treatment of any kind, having more than symbolic value and in any case unrelated to normal courtesy, with the intention of unlawfully favouring the interests of CoopCulture;
- The relationship with the public institutions must be managed only by the suited departments and collaborators; such relations must be based on criteria of transparency and professionalism, in compliance with the measures taken by the bodies in charge;
- If a public institution ends up as a client or supplier of CoopCulture, the latter must act strict compliance with the laws and regulation governing the purchase or sale of goods and/or services to that particular public institution;
- This Policy illustrates the consequences non-compliance with the Corruption Prevention Policy by applying its Disciplinary and Sanctioning System for any behaviour that does not comply with the Policy and the Anti-Corruption Management System in proportion to what is specified in the Code of Ethics;
- CoopCulture encourages the reporting of suspected violation of the Anti-Corruption Management System in good faith or on the basis of reasonable and confidential belief, without fear of any kind of retaliation;
- CoopCulture has established in its organisation a Anti-Corruption Compliance Function (FCA), an independent and autonomous body that ensures the supervision, design, implementation and effectiveness of the Management System in accordance with the ISO 37001 standard.

Monitoring of commitments

To encourage the correct attitude from all the members, CoopCulture has implemented an Integrated Management System and a Company Policy widespread with all the employees and is promoted by the Board of Directors, General Management and Service Managers, including through the Gender Equality Steering Committee and the Social Performance Team (SPT), a body composed of members of the company's management and representatives elected within the Cooperative. The Board of Directors of CoopCulture has nominated and appointed a Transparency and Legality Guarantee Committee, a Compliance Function for the Prevention of Corruption and a Supervisory Body, to which reports can be sent/addressed, even anonymously, guaranteeing the protection of the whistleblower in order to avoid any form of retaliation.

CoopCulture is always available to receive reports, complaints and any non-compliance with social responsibility, gender equality issues and anti-corruption through the following channels: t 39 06 3908071, segnalazioni@coopculture.it, address Corso del Popolo 40, 30172 Venezia Mestre.



Policy for quality, social responsibility, gender equality, health and security work, environment sustainability, information and security privacy, prevention of corruption

CoopCulture is committed to monitor compliance with the principles included in this Integrated Policy thanks to all the system tools adopted, periodically measuring the degree of achievement of specific objectives during Management Reviews.

Venezia Mestre, 12/11/2025

The Ceo
Adriano Rizzi

A handwritten signature in black ink, appearing to read 'Adriano Rizzi'.